BEFORE AN INDEPENDENT HEARING COMMISSIONER ON BEHALF OF THE CHRISTCHURCH CITY COUNCIL

UNDER the Resource Management Act 1991

IN THE MATTER OF The hearing of further submissions by Canterbury Rugby

Football Union (late further submission accepted by the Panel and FS101) on Plan Change 13 to the Operative

Christchurch District Plan

STATEMENT OF EVIDENCE OF JOHN BROWN ON BEHALD OF CANTERBURY RUGBY FOOTBALL UNION

Heritage

10 June 2025

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STATEMENT OF EVIDENCE OF JOHN BROWN

Introduction

- 1 My full name is John Edward Brown. I am a Director at Plan. Heritage Ltd, an independent heritage planning consultancy.
- I hold the qualifications of BA Archaeology (Hons) from University of Newcastle-upon-Tyne, and MA Archaeology (Distinction) from University College London. I am an Associate Member of the Chartered Institute for Archaeology (ACIfA), a supporting member of Institute for Historic Building Conservation (IHBC) and a member of International Council on Monuments and Sites New Zealand (ICOMOS NZ). I am also a member of the New Zealand Archaeological Association (NZAA).
- I have 30 years' experience working in a variety of academic, public sector and commercial roles relating to historic buildings, archaeology and heritage planning. I have worked previously in the UK, and also on projects in Hungary and Israel. Since arriving in New Zealand in 2011, I have been employed in the areas of historic heritage, special character assessment and archaeology, as they relate to the planning framework established by the Resource Management Act 1991 (RMA), and to the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA).
- 4 From 2011 to 2015 I managed the built heritage implementation team at Auckland Council, dealing specifically with the assessment of resource consents for historic heritage buildings and places, and special character assessments.
- In 2015 Plan. Heritage Ltd was established as an independent heritage consultancy, providing heritage policy and planning advice to a range of public and private client sectors. I currently provide expert advice to Queenstown Lakes District Council, Auckland Council, and Far North District Council, among others.
- Following the further submissions by Canterbury Rugby Football Union (**CRFU**) on Plan Change 13 (**PC 13**), I have been engaged by CRFU to consider the removal of the Residential Heritage Overlay **HA3 Church Property Trustees**Overlay (**RHA**) over the entire area it applies to, and more specifically over Rugby Park, and CRFU's two residential units at 6 and 12 Malvern Street, St Albans.

- In the course of my evidence, I have considered the information provided by Christchurch City Council (**Council**) in support of PC13 as it relates to the **RHA**. This primarily is the Significance statement for the RHA, and the data sheets for the specific sites above included in the s32 Report Appendices.
- I have also previously undertaken a site visit on 07 August 2023 to the proposed RHA area including Rugby Park, in response to Plan Change 14 (**PC1**4) and the proposed establishment of the RHA and assessment method.
- I provided evidence on PC 14 on behalf of Kainga Ora (**KO**), which acknowledged the methodology as appropriately referring to regional heritage criteria. However, I expressed a concern that there was risk of conflating RHA's and character areas, and recommended additional research and peer review be undertaken prior to adopting the RHA's in their notified forms.¹

Executive Summary

- This evidence responds to matters raised in the further submission by the CRFU on Plan PC13, with a particular focus on the appropriateness of including Rugby Park and CRFU's two residential units at 6 and 12 Malvern Street within the RHA overlay.
- In forming my view, I have reviewed (amongst other documents) the relevant Council reports, evidence, site records, and Melissa MacFarlane submission on PC 13. While I consider that the general RHA methodology adopted by Council aligns with the Canterbury Regional Policy Statement, I remain of the view, as raised in earlier my Plan Change 14 evidence, that further differentiation is required between Residential Heritage Areas and Residential Character Areas. In my opinion, the evidence does not sufficiently justify the elevation of the entire n area to the status of RHA.
- Turning specifically to Rugby Park, I note that the RHA evaluation materials acknowledge the importance of the 1923 subdivision plan (DP6614) as the basis for defining the heritage area. However, the land now occupied by Rugby Park was sold to CRFU in 1926 shortly after the subdivision, with the park officially opening in 1929.
- While originally part of the broader Church Property Trustees landholdings, its divestment and subsequent long-term use as a rugby ground weaken any strong historical or architectural connection to the residential subdivision.

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¹ PC14 Hearing Evidence of Mr John Brown on Behalf of KO.

Furthermore, while the memorial gates at the corner of Malvern and Rutland Streets may hold individual historic value, other structures on the site, including more recent buildings and fencing, do not contribute to the proposed RHA. I therefore consider there is strong grounds for Rugby Park to be excluded from the RHA overlay.

- With respect to CRFU's residential properties at 6 and 12 Malvern Street, my opinion remains that there is insufficient evidence to elevate the entire area to RHA under PC13. Should the Panel disagree with this assessment, I do note that agree that both properties date back to the interwar period and appear to retain elements of their original bungalow form. However, number 12 has been significantly modified, and number 6 is in poor condition and is partially obscured. On this basis, I consider both properties, if retained within the RHA, would at most be 'contributing' rather than 'defining' properties.
- Overall, I am not convinced that there is a compelling rationale for including Rugby Park or the CRFU residential properties within the proposed RHA, particularly where the historical and architectural links to the 1923 subdivision are weak or inconsistent. If the Panel decides to retain the RHA, I consider it should be more tightly focused on those residential streets and properties that clearly reflect the values identified in the RHA evaluation, excluding open space and sites with limited contribution to the RHA's heritage values.

Code of Conduct

- Although this is a Council hearing, I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence.
- 17 Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

Scope of evidence

- 18 My evidence covers the following matters:
 - 18.1 the points raised by CRFU in its further submissions;

- the methodology and identification of the RHA as undertaken by Council; and included in the s32 report (Appendix 9);
- 18.3 whether the RHA should apply to CRFU's two residential units and/or Rugby Park; and
- 18.4 the section 42A report and evidence prepared by Dr Ann McEwan.
- 19 In preparing this evidence I have read the following documents:
 - 19.1 The section 32 report and appendices (appendix 9) Residential Heritage Area Evaluation pro Formas for The Church Property Trustees /North St Albans (1923 Subdivision) Rha (CPT RHA) prepared by Dr McEwan on behalf of CCC;
 - 19.2 The section 42A report prepared by Glenda Dixon;
 - 19.3 Evidence dated 28 May 2025 prepared by Dr Ann McEwan;
 - 19.4 Submission of Melissa MacFarlane; and
 - 19.5 Submission of KO, and any relevant evidence I prepared on behalf of KO for PC14.

CRFU Further Submissions

- I understand the CRFU generally supports removal of the RHA altogether and changes to the relevant provisions as requested by Melissa MacFarlane in her submission,² and changes to the relevant provisions as requested by Carter Group Limited in its submission. I understand that KO withdrew its remaining submission points under submission #1093 on 4 June 2025. CRFU can therefore no longer support those KO submission points identified in CRFU's further submission #98.
- However, I note that CRFU is more specifically concerned with the RHA applying to Rugby Park and to its own two residential units at Number 10 and Number 12 Malvern Street, as raised in its further submission supporting Melissa MacFarlane's submission. This is the focus of my evidence.
- 22 S135.2 and S1003.7 of Ms Macfarlane seek the removal of the CPT/North St Albans Heritage Area (including over Rugby Park, 10 and 12 Malvern Street), so that only the current Character Area covering most of this area is retained.

² S135.2 and S1003.7.

23 Dr McEwan concludes in her statement of evidence dated 28 May 2025 that, based on the historic heritage values identified and described in the s32a RHA evaluation report, the area demonstrates significant historic heritage values, and therefore merits scheduling as an RHA. She also says that this area has a high-level of authenticity and integrity. This includes the Rugby Park site and Numbers 10 and 12 Malvern Street.

Methodology and Identification of RHA

Methodology

24 In my evidence on behalf of KO for PC14, I considered the application of the RHA Methodology. In my view, the RHA evaluation method is generally appropriately in that it adopts the use of evaluation methods and criteria as set forth in the Canterbury Regional Policy Statement (RPS) for historic heritage.3 However, I also considered that in the context of a Residential Heritage Area, a site-by-site analysis was appropriate in the context of determining whether sites contributed to an area or not. This approach is noted elsewhere, with respect to character overlays.

25 I also raised concerns that, due to the specific focus on 'residential heritage areas', there was considerable scope for overlap with 'residential character areas'.4 In my view, this risks elevation of character and amenity matters address to be had regard to under part 7 of the RMA, to matters of national importance to be protected from inappropriate development under part 6. This was further exacerbated by overlapping terminology of the two processes. In the case of the RHA overlay, on my original site visit I noted that the subdivision displayed a certain 'character' but in my evidence I was not confident that this should be elevated to the status of an RHA, and certainly not without additional research.5

26 In response to concerns raised during PC14, I understand that further review of the proposed RHAs was carried out, and in particular to provide additional definition between RHAs and RCAs. Appendix 1.6f of the Section 32a report provides a 'review checklist' to further clarify where the application of these two elements may differ. The criteria checklist is attached to my evidence as appendix A for ease of reference.

Statement of Evidence Mr John Brown, Plan Change 14, dated 20 September 2023.
 Statement of Evidence of John brown on behalf of KĀINGA ORA – HOMES AND COMMUNITIES Heritage 20 September 2023, at [7.1] to [7.7].

⁵ At [7.1] to [7.7].

- 27 Having reviewed the checklist, I make the following observations:
 - 27.1 There is a key distinction proposed that Heritage Areas are historically connected but not RHAs are coherent in their heritage/history across the area, but may be diverse in visual character, whilst RCAs are coherent and distinctive character across the area but may be diverse in history;
 - 27.2 In this case the subdivision is distinctive in character, while the recreational sites have a divergent history, but I do not see that either limitation necessarily applies;
 - 27.3 RHAs rely of historical and cultural associations to be seen as distinct from RCA's, although in this case, the historical association with the CPT as landowners ceases from the establishment of the three subdivisions. Further they are not evidently shown to have any clear and strong association with the recreational fields (they did not manage the fields or have a stake in them once divested). This might be different for example if they were church allotments attached to the subdivisions, or the church site itself;
 - 27.4 The differentiation of architectural form and construction technologies 'through a historical lens' would equally apply when considering the 'era' of a character area. The question might be to what degree the original fabric is retained;
 - 27.5 Several criteria are not fully expressed, reading 'NA' or 'as part of contextual'; and
 - 27.6 The issue here is the contextual association of the recreational / open space is too broad, as to lack specific relevance to the 1923 subdivision. This might be different where, such as the case of a grand country house, open space and vistas are designed specifically to draw the eye to that feature.
- Having reviewed the conclusions reached by Ms Dixon in Council's s32 and s42A reports and the evidence of Dr McEwan (discussed further below in my response to the s42a report and evidence section), I do not see that there is much in the way of additional material provided since PC14 that augments the current analysis from CCC, leading me to change my conclusion at paragraph [20] above.

On that basis, it is my opinion that there is still a lack of strong evidence from Council to elevate the entire area as RHA. I am therefore unconvinced that the entire RHA area should be accepted as there is insufficient justification for its inclusion into the District Plan, over and above the 1923 streets which are already largely defined by the established character overlay.

Is the RHA Appropriate for CRFU's Sites?

Rugby Park

In essence, although the s32a material notes that RHA's may also include other elements⁶, there is a clear focus on the description of the overlay as relating to the residential subdivision in terms of its identified values. I also agree with the view reached by Mr Joll, that the apparent focus of the RHA controls is to define residential heritage areas, and to protect them from inappropriate subdivision and development. This is primarily expressed through the focus on rules controlling modifications to buildings⁷

This is also because the majority of the proposed RHA area is comprised of the houses and park situated in Gosset, Carrington and Jacobs Streets, and parts of Malvern, Rutland, and Westminster Streets, Roosevelt Avenue and Innes Road, which are predominantly residential in nature.

I note that while the site record form for Rugby Park considers the two portions of open space as a whole, being Rugby Park / Malvern Park, they are actually two separate parks in different ownership – with CRFU owning 179 Innes Road (Rugby Park) and 180 Innes Road, which is owned by CCC (Malvern Park). There is also a separate form for Malvern Park. These two sites are not residential in nature.

As noted in the RHA evaluation report, all of the land above has come from the CPT partial subdivisions of Lot 324 during the interwar period. The extent of Lot 324 is not shown in the report, but wider landholdings of the CPT are referred to, beyond the extent of the proposed Extent of the St Albans Heritage Area. In this regard, the 1923 subdivision of the CPT property has been identified as the focus of the proposed RHA as described in the RHA evaluation report:

As it was drawn up for the CPT in 1923, Deposit Plan 6614 created 116 residential lots and three new streets. Five years

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⁶ Section 32a and Appendix 9.xx RHA vs RCA review criteria.

⁷ Evidence of Mr Joll.

later, DP 9421 formalised the dimensions of the parkland that the CPT had set aside on the northern side of Malvern Street. This action not only maintained the historic sporting use of the land and finally realised St Albans Borough Council's ambition to acquire part of RS 324 for use as a recreation reserve, but it also, according to the trustees, created a more desirable recreation space within their overall land holdings, rather than surveying a number of smaller pocket parks each time they undertook a subdivision. The CPT had previously gifted the eastern half of what is now Malvern Park to the Christchurch City Council in 1922; initially the council had first right of refusal to buy the western portion. After the council decided that the purchase price was too high, the Canterbury Rugby Union purchased the western parcel from the CPT in 1926; it was officially opened as Rugby Park on 26 July 1929'.8

- The dates of divestment from the Anglican CPT ownership are identified as 1926 for the Rugby Park, with Rugby Park officially opening in1929. This is supported by deposited surveys attached to my evidence as **Appendix 2**.
- A key aspect here is that the 'recreational space' referred in the history above at paragraph 33 was in use for some time prior to the 1923 subdivision and additionally served 'the overall land holdings' rather than the 1923 residential subdivision specifically. In other words, the creation of the recreational space was in part earlier than, and independent of, the 1923 subdivision that forms the focus of the RHA.
- In my view, the early association with the CPT ownership of the land for the Rugby Park also falls away three years after the residential subdivision is established. Therefore, for essentially the entire 100-year period of its development as a Rugby ground, it no longer has this association with the remaining residential area also proposed to be included within the RHA.

Other Features of Rugby Park.

I do consider that, as an individual structure, the memorial gates located at the junction of Malvern Street and Rutland Street are of historical interest and may exhibit some measure of heritage significance and therefore protection under the Resource Management Act 1991. However, I am not aware of any recommendation or submission that the gates be evaluated on their own merit.

⁸ Christchurch District Plan Cpt North St Albans Subdivision (1923) Residential Heritage Area Record Form, at page 4.

In terms of the CRFU's other buildings at Rugby Park, it is my view that these do not contribute anything to the RHA, with most of the built form being younger than the '30 years' requirement expressed by the RHA criteria, as evidenced by historical aerial photography and Google Streetview imagery. This includes the corrugated fence which is technically classed as a building given its height over 2m. One other building that is potentially contributory is the scout hut in Malvern Park (east Section). For the Rugby Park site the gates are of historical interest and respond to the heritage evaluation criteria, but the other buildings do not.

Two CRFU Units

- 39 The two units owned by CRFU at 6 and 12 Malvern Street fall within the 1923 subdivision boundary. The specific site record forms are included in **Appendix** 3 to my evidence.
- Aside from my conclusion that there is a lack of strong evidence provided by the Council to elevate/justify including the entire area within an RHA, I do agree with Dr McEwan that both properties contain 'bungalows' of the architectural period of interest. Based on my previous site visit, and a review of historical aerial photography and additional site photographs provided by the submitter, the original cores of these buildings are apparently still present.
- In the case of number 12, the bungalow has been unsympathetically modified over time, including a roof extension which obscures a fair degree of its original form. Should the Panel not reject the RHA in its entirety due to a lack-of evidence by Council justifying the overlay, I consider that number 12 would not be more than a contributing property on this basis. Currently it is indicated as a defining property.
- It appears that no 6 Malvern Street retains more of its original form, but it has apparently been re-roofed and there are modifications to street facing windows. There are obscuring ancillary structures and fencing which partially obscures the main dwelling from most vantage points. Additionally onsite photography indicates it is in a generally poor state. Arguably this property is also at the 'contributing' level that than a 'defining' level.

Response to S42A and Council Evidence

- In the s42a report referring to the proposed RHA, Ms Dixon discusses the several submissions relating to the area. Noting a disagreement regarding the nature of the open space, Ms Dixon relies on the evidence of Dr McEwan⁹, who 'states at her paragraph 75 that the development history of the park is integral to the history and heritage significance of the RHA'. Ms Dixon then disregards the submission by CRFU on the basis that no evidence is provided to assert their claim. Following my direct enquiry, the CFRU's historian has additionally confirmed via email that on sale of the land at Rugby Park, the CPT did not maintain any controlling interest or influence. I am not therefore convinced of the integral nature of the recreational space, rather the area as proposed feels more a game of two halves.
- As discussed above, my understanding from the historical information provided is that there is, other than the prior ownership of the land by the CPT, no especial masterplan design and/or connection between the 1923 subdivision sites and the Rugby Park / Malvern Park Sites. The CFRU historian has confirmed that CPT retained no controlling interest upon sale of the site.
- Rather, the 1923 subdivision is a distinct entity, with the Rugby Park/Malvern Park Sites being treated separately. Being the eastern half vested to Council as Malvern Park, one year prior to the subdivision, and the other (Rugby Park) passed over to the CRFU three years later. This is supported by the historical deposited plans, provided in the assessment document.
- In my opinion, these recreational sites have a historical amenity at best, and the isolated features that might require individual protection are the memorial gates. However, the sites do not define (either together, or by themselves) the nature of the 1923 subdivision. I therefore disagree with Ms Dixon, relying on the evidence of Dr McEwan, that the recreational sites (either together, or by themselves) are integral to the history and significance of the RHA. Rather, the recreational amenity was, and still is, much broader in nature, and not specifically related to the values attributed to the housing subdivision itself.

⁹ Evidence of Dr McEwan for PC13, paragraph 75

Conclusion

- In My opinion, the extension of the RHA to include the recreational area of Rugby Park and Malvern Park as an 'integral' part of the St Albans Residential Heritage Area is too reliant on broad contextual history, which applies equally to the other sites.
- I accept and agree that the 1923 subdivision area, as defined by DP6266, forms the boundary of a defined residential subdivision, with the character of a 1920s bungalow suburb.
- 49 Unlike other suburbs of the interwar period that may have been developed strategically and master planned as part of a 'garden suburb' ideology, the St Albans subdivision appears more piecemeal in nature.
- I also note that the Malvern Park and Rugby Park sections were subdivided and sold off independently of the residential subdivision.
- I therefore do not consider that these sites have especially strong connection to the architectural values which appear to the primary focus of the proposed RHA.
- Overall, I consider that the 1923 subdivision exhibits a clear character of an interwar bungalow subdivision. I am not especially convinced that this is strongly distinct from an amenity aspect that it would therefore merit recognition as a heritage area, rather than the character overlay. However, if the Panel disagrees and the RHA was to be retained, then I do not consider the Rugby Park and Malvern Park Sites specifically relate to this RHA, such that they should be controlled as par of the heritage area.
- I also anticipate that, as open space and recreational space, they would continue to provide a similar amenity of backdrop to the RHA over time, in case.

Appendix A – RHA Review Criteria (Section 32 Appendix 10)

Criteria for Identifying Residential Heritage Areas vs Criteria for Identifying Residential Character Areas

RHAs: coherent heritage/history across the area, but may be diverse in visual character.

RCAs: coherent and distinctive character across the area, but may be diverse in history.

Note: The word "primary" which has been used by other authors in RCA documentation means the same as "defining" for RHAs.

RHAs	RCAs
Represent and embody at least one of the following six heritage values at a significant or highly significant level.	Neighbourhoods that are distinctive from their wider surroundings and which are considered to have a special and consistent character that is worthy of retention.
A) Historical and social value	A) N/A
Values associated with a particular person or group, organisation or event, phase or activity (intangible, not visible).	
B) Cultural and spiritual value	
Values associated with the distinctive characteristics of a way of life, philosophy or belief (intangible, not visible)	N/A
C) Architectural and aesthetic value Values associated with a particular style, period or designer, or design values (i.e. an historical lens is applied to these values).	Consistent architectural detail from the era (age band) e.g. bay and bow windows, leadlights, shingle gable ends.
D) Technological and craftsmanship value Values associated with nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period (i.e. an historical lens is applied to these values).	Consistent architectural detail from the era (age band) e.g. weatherboard cladding, iron or slate roofing, steeply pitched roofs, window shutters.

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E) Contextual value	
Values associated with a relationship to the environment, landscape or streetscape; a degree of consistency in terms of type, scale, form, materials etc (i.e. the physical background to the heritage values).	RCAs are identified through consideration of built form and landscape elements which make up the overall character of each area. — continuit of subdivision pattern, buildings, structures, landscape, garden and other features – see above re. architectural detail and below re other matters (These are visible values.)
F) Archaeological and scientific significance	N/A
Values associated with potential to provide information and understanding about past events, activities, structures or people (generally not visible).	
Demonstrates a moderate to high degree of authenticity and integrity (including limited degree of modification). Must be sufficiently intact to demonstrate physical evidence of heritage values.	There is no specific integrity threshold, but integrity is important in contributing to the area's overall value. Unsympathetic alterations usually reduce rating.
Group of interrelated historic heritage places, buildings, structures and sites within a geographic area with clear boundaries, that together address the interconnectedness of people, place and activities.	Area with consistent character of built form and landscape elements.
A comprehensive, collective and integrated place with coherent heritage fabric (i.e. not fragmented).	Some do exclude some areas within them e.g. Beckenham (large clusters of rear sections) and Cashmere.
RHAs are identified and defined as having a continuous shape/area without "holes".	
Contains a majority of sites/buildings that are of defining or contributory importance to the heritage area.	Minimum of 50% of buildings must be assessed as primary sites and a minimum of 30% as contributory sites, ie a total of 80% being primary and contributory sites.
Use of 50% defining and contributory as a measure of sufficient integrity (or not) to be an RHA, although this is not determinative on its own.	In some cases where primary sites exceed 50% but area does not

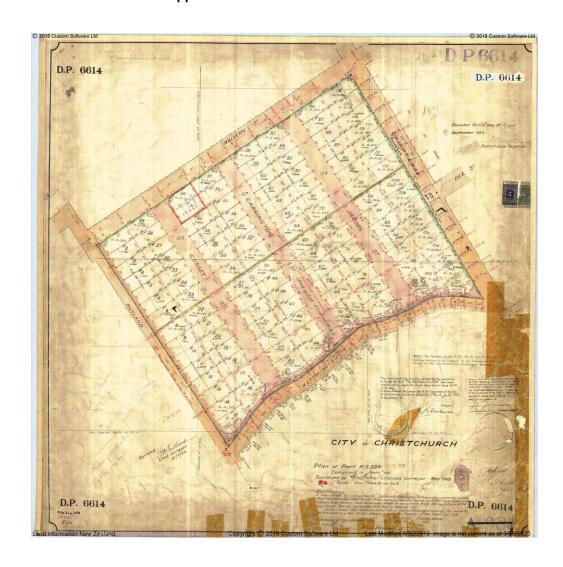
Has been predominantly developed more than 30 years ago.	RCAs seek to retain residential buildings built prior to 1945, or for Bewdley, prior to 1970.
Associated primarily but not exclusively with residential use. They may include parks and open spaces, non-residential buildings and churches where these are integral to the heritage of the area.	Do not include parks, and heritage items and settings are excluded for assessment purposes.
RHAs generally exclude properties not visible from the street unless this would create a hole in an area which is otherwise coherent.	RCAs generally exclude properties not visible from the street or large clusters of rear sections.
Meets the minimum size for RHAs (one street block, one side of street/minimum of approx. 15 properties).	Range in size from a minimum of 20 sites, upwards to 880 sites. Generally include both sides of a street unless on the outer extent of the area.
Conveys/represents important aspects of the Christchurch District's cultural and historical themes and activities.	N/A
Makes a significant contribution to the Christchurch District's sense of place and identity, and an understanding of its history and cultures.	Special character worthy of retention i.e. makes a significant contribution to the District's sense of place and identity.
Of heritage significance to the Christchurch District (and may also be of significance nationally or internationally).	N/A
May be part of contextual value	[In the following section, consistency is in relation to the era of development and its characteristics.]
	Relative consistency of Height e.g. generally single storey
May be part of contextual value	Consistency of Built scale and form e.g. small to moderate scale, or large and detached
May be part of contextual value	Consistency of Roof form eg simple vs complex

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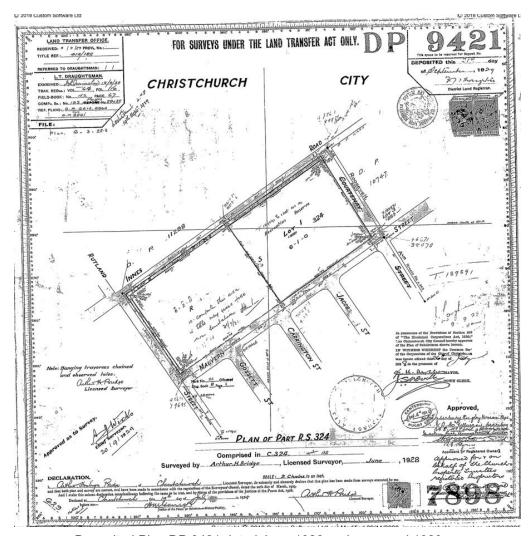
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May be part of contextual value	Consistency of Site Coverage/open space le pattern of development, degree of spaciousness
May be part of contextual value	Relative consistency of Road boundary setback depth
May be part of contextual value.	Relative consistency of Fencing type and height e.g. low to medium (1m -1.5m) or some stone walls
May be part of contextual value	Vegetation/Landscape features on sites e.g. landscaping in the front yard, richly planted established gardens, some large trees/shrubs
May be part of contextual value	Garages – are they excluded from the streetscene i.e. located to the rear of lots?
May be part of contextual value	Streetscape – e.g. narrow streets or wide berms, mature street trees providing amenity
N/A	Visual connection of windows and front doors with street –e.g. low or no fencing, placement of windows and dwelling entrances
Public realm features e.g. lighting, paths, widths of streets, views etc. are recorded on overall RHA reports to provide a full description of the area and provide guidance for future public works.	Other features e.g. consistency of colour scheme of houses, important views from public places in Lyttelton.
N/A - No design guides for RHAs developed as yet.	Design guides – there are existing non-statutory design guides for Character Areas, which include background information on the characteristics of the area.

Appendix B - Historical Plans and Aerials



DP6614 dated 1923 showing the specific residential lots which formed the subdivision. Malvern Park and Rugby Park are excluded.



Deposited Plan DP 9421 dated June 1928 and approved 1929.



Detail from 1940 Aerial Photograph (SN152_Crown_152_128_48)



Detail from 1972 Aerial Photograph SN2493_Crown_2493_B_7



Detail from 1981 Aerial Photograph showing demolition of earlier club building.



2025 Google Aerial satellite imagery showing redeveloped club buildings