

**BEFORE THE INDEPENDENT HEARING PANEL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** Proposed Plan Change 9 to the  
Operative Hamilton City District Plan

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**MEMORANDUM OF WAIKATO HERITAGE GROUP**

**BUILT HERITAGE – INTERIM GUIDANCE**

**DATED 8 DECEMBER**

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## MEMORANDUM

1. This memo concerns the interim guidance [dated 27 November 2023] from the Hearing Panel (Panel) on the assessment methodology to be applied to Built Heritage items. The panel has invited parties to raise any questions and seek clarification of the Interim Guidance, and Waikato Heritage Group hereby does so.

2. In the Interim Guidance the panel state:

*“...at this juncture we find it unlikely that BH items of Medium significance will be included in Schedule 8A”.*

3. The panel will be aware the existing Operative District Plan, 8-1.1 - Rankings of Significance provides for built heritage to be included within Schedule 8A where it is of moderate value:

***Plan Ranking B:** Historic places of significant heritage value include those assessed as being of high or moderate value in relation to one or more of the heritage criteria and are considered to be of value locally or regionally. [underline added]*

4. 122 structures are currently listed as Built Heritage items in Schedule 8A of the Operative District Plan. Apart from some buildings that have been demolished or relocated etc the existing Built heritage items in Schedule 8A have not been re-evaluated as part of Plan Change 9, but where evaluated for the Operative District Plan.
5. Accordingly, we understand the removal of any other existing Operative District Plan built heritage item from Schedule 8A is not within the scope of Plan Change 9, as notified.
6. Notwithstanding our understanding, we seek clarity on the position of existing Built heritage items in Schedule 8A, particularly those that have been assessed as being of moderate heritage value in previous District Plan reviews [which would not meet the new threshold].
7. We also seek clarity on how any new Built heritage items will be presented / addressed within Schedule 8A, where they have applied the new ranking threshold i.e., high heritage significance against existing items which have applied the existing Operative District Plan Rankings.

8. We understand that once Plan Change 9 is Operative there will be no way to identify which are existing Built Heritage items and which have been introduced through Plan Change 9.
9. It may be appropriate to clearly identify within the District Plan the different assessment methodology and thresholds for the current Operative District Plan Built heritage and those which have been introduced through Plan Change 9.
10. Clarification is sought on how this will be addressed from a planning perspective and whether the panel is seeking evidence on these matters in the upcoming hearings.

#### **DIRECTIONS SOUGHT**

1. Confirmation on the status of existing Built heritage items in Schedule 8A, particularly those that have been assessed as being of moderate heritage value in previous District Plan reviews.
2. Clarity on how the District Plan will address the different assessment methodology and thresholds for the current Operative District Plan Built heritage items versus those which have been introduced through Plan Change 9 and if evidence is sought on this matter for the hearings next year.

On behalf of Waikato Heritage Group

8 December 2023