

Hearing Statement - Plan Change 9: 15.11.23

My full name is Hannah Olivia Palmer. I am an Environmental Consultant at Place Group Ltd (Place Group); a specialist resource management planning consultancy based in Hamilton. I have been in this position since May 2017.

I hold the qualification of Postgraduate Diploma in Resource and Environmental Planning obtained in 2011 from the University of Waikato. I also hold a Postgraduate Diploma in Earth Science and a Bachelor of Science from the University of Waikato. I am an Associate member of the New Zealand Planning Institute.

I have 12 years' planning experience and have previously held planning positions at Opus International Consultants, Latitude Planning Limited, and Southland District Council. I have been involved in a range of resource management projects including preparation of evidence for the Proposed Auckland Unitary Plan, Proposed Waikato District Plan, preparation and processing of resource consents, policy analysis and processing of plan changes.

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I have been authorised to speak on behalf of Barbara Turner as a witness in support of her further submission to Plan Change 9. I was not involved in the preparation of her submission, and have only been brought onboard as of last night.

I note that Mrs Turner's further submission was in support of that prepared by The Harrowfield Club and Dr Bryan Bang who sought to have the suburb of Harrowfield considered as an historic heritage area. The reason for seeking this inclusion largely pertains to the original vision of the developer in terms of layout, form and function, and the culture that has been created within this residential enclave. Mrs Turner supported Dr Bang's submission as she saw that this was potentially the only avenue to have the character of Harrowfield considered for protection in the Plan. I would like to expand on this, and present an alternative.

The section 42A report makes reference to Mr Knott having undertaken a further assessment of Harrowfield using the proposed methodology for assessment of historic heritage areas. It found that this suburb did not meet the proposed threshold for inclusion in appendix 8D as a 6(f) matter of national importance under the RMA. I could not find the supplementary evidence by Mr Knott in the 42A report on the council website containing this assessment, however it appears from earlier evidence of Mr Knott that Harrowfield has largely been discounted for inclusion in the Plan due to the suburb post dating 1980.

Although I agree that there needs to be a line drawn for heritage areas in terms of inclusion in the Plan, I submit that areas like Harrowfield which do not meet the HHA criteria due to age, but present a distinctive and cohesive character, and contribute to maintenance of amenity values and the city, now have no home in the Plan. This is particularly problematic with the impending Plan Change 12, which seeks to remove special character zones from the District Plan, with protection only being provided to properties identified in an HHA through Plan Change 9.

To address this issue, I suggest that the hearings panel considers retaining a two tier system in the Plan - HHA's and Special Character Areas or Character Zones. At present there appears to be no provision or qualifying matters in the Plan for identifying additional Special Character Zones in the Plan beyond the six areas which have already been included in Chapter 5. Whilst Plan Change 9 seems to absorb these existing special character zones as HHAs, I consider that a set of criteria should be retained in the Plan for assessing and including potential areas which present distinctive character and contribute to amenity. This is a well recognised planning approach across the country.

To enact this, a similar approach to what has been undertaken for HHAs could be employed with an overlay. Assessment under the RMA of development proposals in these areas would be directed to 'Other matters - sections 7(c) and (f)' rather than section 6. Setting Special Character Area Criteria would require additions to Chapter 5, and would potentially need some further input from heritage experts.

It is my view that heritage is not static and is continually shifting, therefore protecting areas exhibiting high character has the potential to conserve the heritage of tomorrow. To not make provision within the Plan to protect areas that may meet HHA criteria, but are out of scope of the assessment due to post dating the assessment time periods, is in my opinion detrimental to the character and amenity of our city.

In summary, we seek that the hearings panel considers further avenues for protecting high character areas such as Harrowfield, in light of both Plan Change 9 and impending Plan Change 12.

I'd be happy to provide this statement in writing, if it would assist the Panel.