

BEFORE THE HEARING PANEL

**IN THE
MATTER OF**

**The Resource Management Act 1991
(the Act)**

AND

**IN THE
MATTER OF**

**Proposed Plan Change 9 to the
Operative Hamilton City Council
District Plan**

**HEARING STATEMENT OF BORIS BOGDANOVIC ON BEHALF OF
HERITAGE NEW ZEALAND POUHERE TAONGA**

May 2023

INTRODUCTION

1. My name is Boris Bogdanovic. I am a Conservation Advisor with Heritage New Zealand Pouhere Taonga (HNZPT). I am here today with my HNZPT colleague Carolyn Anne McAlley, a Planner at HNZPT and I will present a summary of my evidence, and rebuttal around the matter of the criteria and methodology of assessing Historic Heritage Areas (HHAs) and the provision of Heritage Impact Assessment reports.

SUMMARY

2. I have read the rebuttal evidence of Richard Knott¹, Dr. Kai Gu² and Mr. Robin Miller³, and the 'Opening Legal Submissions on Behalf of Hamilton City Council'⁴. Overall there is a lot of agreement between myself and Mr. Knott's evidence.
3. In particular, I note our opinion with regard to extent of the Victoria Street Historic Heritage Area and Frankton Railway Village Historic Heritage Area. In my opinion the extent as delineated in the Heritage New Zealand Listing is reflective and demonstrative of the heritage values for which each is considered significant. Change is a constant, and ensuring the District Plan captures the true and full extent of the HHA is important in managing future change and maintaining the interrelated heritage values of the whole.

HISTORIC HERITAGE AREAS

4. Historic Heritage Areas (HHAs) are defined by their integrity as much as component parts. It is the consideration of both aspects together that informs and determines heritage value and the therefore significance and continuity of an HHA. They are not mutually exclusive.
5. As such, I concur with Mr. Knott's statement that: *"The purpose of HHAs is not to identify individual buildings, but to identify areas which are representative of the development periods. Individual buildings do not necessarily have historic heritage value in their own right but do so as part of the collective whole."*⁵

¹ Knott, Richard John, "Statement of Rebuttal Evidence of Richard John Knott (Historic Heritage Areas), Dated 12 May 2023

² Gu, Kai, "Statement of Rebuttal Evidence of Kai Gu (Historic Heritage Areas)", Dated 12 May 2023

³ Miller, Robin, "Statement of Rebuttal Evidence of Robin Alexander Keith Miller (Historic Heritage Areas)", Dated 12 May 2023

⁴ Muldowney, LF & Thomas, SK, "Opening Legal Submissions on Behalf of Hamilton City Council, Session 1: Historic Heritage Areas", Dated 23 May 2023

⁵ Knott, Richard John, "Statement of Rebuttal Evidence of Richard John Knott (Historic Heritage Areas), Dated 12 May 2023, (Pg. 3:2023)

6. To understand, appreciate and protect the 'collective whole' of an HHA there must be a consideration of its specific heritage values. Mr. Knott's criteria and methodology were informed by and created specifically for Kirikiriroa Hamilton and capture those given heritage values. In my opinion this encapsulates the current assessment criteria and would give effect to the WRPS in a meaningful and site-specific way by focussing on what is unique to Kirikiriroa Hamilton.
7. Furthermore, by defining what is unique, Mr. Knott's criteria and methodology offer a fine-grained approach that will allow for the easy identification "of those features of the area which make the greatest contribution to the historic heritage values of the areas"⁶. In my opinion this will provide for an efficient and economical consenting process and allow for an appropriate level of protection for historic heritage at the District Plan level.

PROVISIONS - HERITAGE IMPACT ASSESSMENTS

8. One element where I do not agree with Mr. Knott's statement regarding the requirements of Heritage Impact Assessments (HIAs) when considering the management of change at historic places. In particular, I do not agree with the view that "a proviso could be added so that this requirement might be waived at the discretion of the planning officer, where it is patently apparent that adverse effects will not arise from a proposal."⁷
9. In my opinion evaluating how change is managed at historic place necessitates specialised knowledge. It requires an understanding of both physical/tangible heritage value (e.g. the age, condition, quality and importance of walls and floors etc.) as well as conceptual/intangible heritage values (e.g. the significance of association with historic figures or events and what that means today etc.). In terms of best practice, there should also be architectural skills based on a knowledge of buildings and structures not to mention an understanding of the wider historic heritage environment, including urban design and planning.
10. Most importantly, experience is needed to assess how all these seemingly disparate component parts contribute to an understanding of the significance of the whole. This is why I do not agree that it is sufficient to simply "assess the impacts of the proposal against the heritage values identified for any particular HHA and addressing the checklist of information

⁶ Knott, Richard John, "Statement of Rebuttal Evidence of Richard John Knott (Historic Heritage Areas), Dated 12 May 2023, (Pg. 6:2023)

⁷ Ibid, (Pg. 15:2023)

required under Rule 1.2.2.8.”⁸ While an HIA does not need to be long or detailed to be effective, it must be a synthesis rather than a checklist; and that is why in my view it must be carried out by a practitioner with experience and qualification in historic heritage and its many facets.

Boris Bogdanovic

29 May 2023

⁸ Knott, Richard John, “Statement of Rebuttal Evidence of Richard John Knott (Historic Heritage Areas), Dated 12 May 2023, (Pg. 15:2023)