

Plan Change 9 – Historic Heritage Areas

Response to the supplementary evidence of Mr Richard Knott on the matter of assessment methodology in relation the inclusion of Historic Heritage Areas in Plan Change 9

By Dr Warren Gumbley

13 October 2023

1. I wish to comment on the matter threshold for inclusion. In general terms, I support the position of Dr Ann McEwen and Mr John Brown that moderate is insufficient as a threshold for the inclusion of items for protection.
2. Dr McEwen and Mr Brown propose that the meaning of “moderate” follows the definition given in The Oxford English Dictionary. It is “average in amount, intensity, quality, or degree”.
3. I find Mr Knott’s assertion that the matter of thresholds a distraction (para 7) is hard to understand when it is central to the evaluation process. Thresholds are an inherent necessity in decision-making processes such as this, and the form of Mr Knott’s evidence proves this. The WRPS criteria (APP7) are a tool for establishing value or significance, placing the item under consideration in one of the significance “boxes” ranging from outstanding to none. The following logical step is the assessed items against a threshold where protection is merited.
4. Mr Knott spends several paragraphs exploring this issue. He makes the point that the RMA does not explicitly identify a threshold that an item must meet but states that an item must “contribute to an understanding and appreciation of New Zealand’s history and culture”. This is a very broad definition and one which a great many items of varying natures and ages meet. However, some items have more value or significance than others. This is recognised in the need for criteria to assess the values associated with an item and its significance (‘Evaluation Indicators’), which must be expressed as one of six categories ranging from unknown to outstanding.
5. In paragraph 23, Mr Knott makes the point that an item assessed as having ‘low’ value, while able, in some small measure, to contribute to our understanding and appreciation of New Zealand’s history and culture, does so minimally. The impression I gain from this is that Mr Knott proposes that an item assessed as having a ‘low’ value makes a contribution too low to be worthy of protection. In paragraph 24, he makes the obvious point that an item assessed as having ‘moderate’ is more worthy of consideration for inclusion and asserts that, in his opinion, an assessment of ‘moderate’ significance is sufficient to cross the threshold to merit protection, yet he provides no cogent or rational argument to support this assertion. It is a “just-so” argument. In paragraph 25, Mr Knott admits that this is a “move someway off the usual expectation than an area must be of ‘high’ or ‘outstanding’ value”. He states that he considers “that it more clearly reflects the RMA than other approaches do”. I do not see any argument presented to support this assertion. Mr Knott admits that his approach is exceptional in

promoting a threshold at 'moderate' but presents none of the argument in support that I would expect for such exceptionalism.

6. In my experience, both as a professional with over 30 years in the heritage field and as one of the people intimately involved with the promotion of Hayes Paddock for protection, Hamilton City Council, along with other authorities, have always relied on items proposed for protection meeting 'high' or 'outstanding' levels of significance for inclusion. I do not see any argument proposed for a change to lower the threshold to 'moderate'.

Dr Warren Gumbley

A handwritten signature in black ink, appearing to read 'Dr Warren Gumbley', with a large, sweeping flourish at the end.

13 October 2023