

**BEFORE THE 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

**AND**

**IN THE MATTER** Session 1 Historic Heritage Areas

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**STATEMENT OF EVIDENCE OF LAURA LIANE KELLAWAY**

**ON BEHALF OF WAIKATO HERITAGE GROUP # 427**

**DATED 28 04 2023**

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## INTRODUCTION

1. My name is Laura Liane Kellaway. I hold a Bachelor of Architecture Degree and a Master of Architecture Degree from the University of Auckland. I am a member of ICOMOS New Zealand. I am a registered Architect and a Fellow of the New Zealand Institute of Architects. I have practised for over thirty years specialising in heritage with experience in the building, heritage consultancy and architecture. I am a Waikato based Historian.
2. I am acting on behalf of the Waikato Heritage Group.
3. As a long-term resident of Hamilton, I am familiar with both Hamilton and the greater Waikato region.
4. The Waikato Heritage Group submission number is # 427 and includes a further submission.
5. Waikato Heritage Group (WHG) is a non-statutory, independent voice for heritage in Hamilton. Their main aim is to help preserve historic places in Hamilton; and the greater Waikato region for the benefit of present and future generations and to lift awareness and appreciation of heritage values. WHG members have been involved in identifying and protecting the region's limited historic heritage for many years and include historians, conservation architects, and members of the community. This work has included key roles in establishing community-recognised historic areas and sites, including South End Victoria Street, Frankton Railway Village and Hayes Paddock.
6. My practice involves architecture and assessing and addressing heritage-related and architectural issues in New Zealand, and includes submitting to Hamilton City Council District Plans since 1991. I have been engaged as an expert witness. I have worked with a range of councils, including as Conservation Architect for Heritage New Zealand Pouhere Taonga. I have been involved in identifying and assessing historic heritage in New Zealand, including the Waikato, for over thirty years, and assisting heritage owners. I have provided advice on character areas and historic areas since the 1990s.
7. I have written and reviewed statements about physical heritage as a means of establishing heritage values, reviewed building developments, participated in heritage studies, written Conservation Plans and been involved in historic and character areas in New Zealand for over 30 years. I was directly involved in the Waikato Heritage Study 1999, the only Waikato regional based heritage study, which looked at the Waikato region, including themes and potential heritage areas.
8. I am familiar with the existing Special Character Areas proposed as Historic Heritage Areas and associated histories over a 35-year period, including Frankton Railway Village, Hayes Paddock, Claudelands West, and Hamilton East. I am aware of a number of the proposed areas. I was a member of the South End heritage group which initiated the proposed historic South End historic area in the 1990s and contributed to the associated South End heritage guide.

9. I carried out site visits to the proposed HCC HHAs over several days in March 2023. I also took part in the expert conferencing event on 17 March 2023 and confirm my agreement to the content of the Joint Witness Statement but noting my conflict in relation to a personal submission, and former member of the Waikato Heritage Group.

## **CODE OF CONDUCT**

10. I am familiar with the Code of Conduct for Expert Witnesses (Environment Court Practice Note 2023) and although I note this is a Council hearing, and agree to comply with this code. The evidence I will present is within my area of expertise, except where I state that I am relying on information provided by another party. I have not knowingly omitted facts or information that might alter or detract from opinions I express.

## **SCOPE OF EVIDENCE**

11. The purpose of this evidence is not to restate matters that are already contained in reports or that have not been identified as controversial following expert conferencing. Rather it is to highlight significant points made in the submissions of WHG and to address significant matters in contention arising from submissions, further information provided by Council and its experts, or any matters of disagreement between experts.
12. The scope includes:
  - a. general Historic Heritage including Heritage Landscape in regards HHAs
  - b. proposed historic heritage areas
  - c. background histories
  - d. chapter 9 and chapter 12 items

## **EXECUTIVE SUMMARY**

13. In anticipation of urban intensification [through Plan Change 12] and to underpin conservation planning policy, the adoption of historic heritage areas by the Hamilton City Council (**HCC**) is to ensure built heritage features are protected.
14. For heritage assets, their value emanates from a shared historic cultural context. The heritage assets are associated with buildings, landscapes and natural features that are embodied within a physical state or property. The property regime within Hamilton is predominately private, individually owned, and because areas which have heritage value commonly also have other values, key issues can emerge at the interface between management or preservation of heritage assets, and the management of those other, non-heritage values.
15. The identification and assessment of Historic Heritage Areas (HHAs) in PC9 have been anchored around 'development periods'. These are identified as: pioneer development (1860s–1880s), late Victorian and Edwardian and during and after inter-war growth (1890s–1940s), and early post-war expansion (1950s–1970s) (Development Periods).
16. In my view, the history and uniqueness of Hamilton is largely connected to the structure of its physical form linked to the particular socio-economic needs of society at the time. However, I consider the historic urban landscape has not been properly considered, where it

relates to the proposed HHAs, and where it does not relate to buildings and rather landforms, vegetations, gardens and other landscape features which form part of the setting and context for historic heritage in Hamilton. These are all natural and physical resources that contribute to an understanding and appreciation of Hamilton's urban history.

17. In general terms, I consider the proposed HHA identified are appropriate with a range of housing areas and the addition of two commercial areas. But there are some adjustments needed, including of range of areas should be included, and the supporting rule framework in the District Plan requires amendment to ensure robust protection of the historic heritage within the HH areas.
18. Two areas have been previously recommended and provide a more robust selection rather than being housing focused. The agricultural, industrial and scientific development in Hamilton as the regions centre have not been included. Existing reports were available in Council such as the former New Zealand Co-operative Dairies complex within Frankton.
19. There is a need to ensure the history of Hamilton and its development pattern is fully understood in order to underpin the identification, establishment and delineation of the boundaries of HHAs. This would also enhance the efficacy of the implementation of HHAs and identification of future areas.
20. I disagree with some of the histories that have been included and note that any base used for the purpose of historic heritage should be reviewed. The history of the city as one town is inaccurate. In the development of Hamilton city there are two distinctive 19<sup>th</sup> century towns Hamilton and Frankton (and separate boroughs) until 1917. Histories can be subjective however there are aspects which do not support local histories and existing 19<sup>th</sup> and 20<sup>th</sup> settlements which were taken over by Hamilton. Mapping of boundary extensions does not include the pattern of settlement in the map provided. A peer review by historians of the recent histories and Pc9 map is recommended as these form a base for future HHAs.
21. The alignment of the Frankton Railway Village (Settlement) is supported and after 30 years of misalignment will ensure a more robust approach and improve the integrity and authenticity of the HHA. Inclusion of the factories site is appropriate and helps with understanding industrial heritage

## **HHA ASSESSMENT CRITERIA / METHODOLOGY**

22. The heritage themes in the HHA Assessment Report underpin classification of the types of HHAs. In the Historic and Cultural Heritage Assessment Criteria set by the Waikato Regional Policy Statement (10A, 2016, updated 2018), the emphasis is on historic heritage that is representative of a significant *development period* in the region or the nation. The identification of development periods is therefore fundamental for heritage assessment.
23. Mr. Knott's approach has used the WRPS 10A [now APP7] & District Plan 8-1.2 criteria, where they are relevant to HHAs (as opposed to individual historic buildings and structures).
24. The focus of this appraisal has been on the visual consistency of defined areas; prioritising the visible integrity, consistency, and representativeness of the area's remaining historic

features and aesthetic appeal of the area. The focus has been on identifying the physical and visible elements of the historic form, including the street pattern/layout, topography, lot layout and density, architectural and built forms, and street frontage treatments, while also evaluating the representativeness (remaining integrity) of the identified development period.

25. Visual consistency may apply to state housing or groups of mass-produced housing, however consistency is difficult to see and judge unless the history of the area and its building typologies are researched. This is particularly relevant to mid-century private housing, and illustrated by looking at Fairview Downs and where what appears to be inconsistency is wider range of standard house plans and a deliberate pattern that makes it difficult to see today. Equally a historic town street is unlikely to have consistency unless as a result of an event such as Napier.
26. A focus on 'front' architecture leaves rear structures vulnerable and the elements important to that particular historic area which may be historic alleyways, arcades, and in residential areas both houses and Hamilton's industrial heritage. The review of rules in 19.3.2 improve the chance of rear heritage being retained, however identification for clarity remains unresolved. There has been no identification of rear residential or commercial heritage in the proposed commercial HHAs. Further identification to assist owners and planners is recommended, in which historic landscape can also be identified by a heritage landscape architect.
27. The broad level of site extents and contributing elements is at a broad level, which can be useful, however for owners difficult in my view. Contributing and non- contributing (for the purpose of demolition only) with HHAs should be considered such as used by Wellington City Council.
28. Consideration of the HHAs require the application of the definition of 'historic heritage' provided in the Resource Management Act 1991, which includes historic areas that *"contribute to an understanding and appreciation of New Zealand's history and cultures"* deriving from archaeological, architectural, cultural, historic, scientific, or technological values.
29. In my view, a more holistic, multidisciplinary approach that considers multiple values that contribute to the significance of a historic heritage area or place is needed. A place-based approach that acknowledges the diversity of Hamilton's historic heritage [as a 20<sup>th</sup> century provincial centre] and the range of forms it takes, including landscapes, features, sites and settings is needed, along with cultural landscapes. Such an approach would allow for a full understanding and appreciation of the values and overall significance of each HHA. A place-based approach is in accordance with recognised good heritage practice, both within New Zealand and internationally (ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value, Revised 2010).
30. It is acknowledged that the brief for the proposed HHAs was residential, as one category /or type of historic heritage, and that additional have been added from submissions. The incorporation of two commercial areas is supported however scientific and technological areas have not been identified and assessed, such as significant themes including industry,

science and dairying as outlined in Ms Williams A Thematic Study. This does not in my view give a representative range of HHAs in an overall review of Hamilton's historic heritage.

31. Another decade within protection is likely to remove identified but not protected local and regional heritage, such as the above. It is unclear whether in the Frankton review for HHA whether this extended to the former NZCDC complex, significant regional heritage. If included with the further process of notifying owners this should be considered.
32. HHAs can reflect successive layers of history, such as those that have been used in a variety of different ways and/or with different physical expressions over a period of time, may have multiple contextual themes.
33. Integrity and rarity are factors that can apply to assessment. Integrity does not necessarily relate to the way an area was when it was established but can derive from a wider period of significance. Later modifications to the place could be just as significant (sometimes more) than an original design or configuration. Areas may be modified over time but not all change is detrimental. Modifications should be assessed as to the effect they have on the overall significance of the overall area.
34. Integrity does not only relate to physical fabric; the way integrity is considered is dependent on the value being assessed (e.g., historical). There are different aspects of integrity to consider, including the materials used, the design and craftsmanship involved, the location, immediate setting and wider visual linkages, the continuing association with significant people or institutions or cultural practice and intangible values included in historic heritage.
35. There are different standards for integrity, depending on the reasons the place is significant. For a place that represents the work of a notable architect, design integrity is very important. For a place that is significant for its association with an event, the more important aspect of integrity is that the place is much the same as it was when the event occurred. A framework for nationally significant and local significance and some variation to a higher level of protection has not been addressed. It would allow more flexibility for local heritage sites and more robust control for national significance. It will be particularly important with intensification where integrity of settings and surrounds and open space is at risk.
36. While a number of new rules for the proposed Historic areas are in Plan Change 12 and as such out of scope, it remains a concern that the advancement of an integrated approach to historic areas may lead to unintended consequences as the following rules will impact on sustainability of the historic heritage as a finite resource in my view. These include the following rules proposed to be modified through Plan Change 12:
  - 19.4.2 - Historic Heritage Areas - Density
  - 19.4.3 - Historic Heritage Areas - Site Coverage
  - 19.4.4 - Historic Heritage Areas - Permeable Surface and Planting
  - 19.4.5 - Historic Heritage Areas - Building Heights
  - 19.4.6 - Historic Heritage Areas - Height in Relation to Boundary
  - 19.4.7 - Building Setbacks

37. HHAs may have either or both tangible and intangible values. This includes sacred places, battle sites, the locations of historical or traditional events, former associations with significant people or other geographic locations that have strong social or cultural associations and connections. Allowing in criteria for a range of types and combinations is important in criteria and in the rule framework.

## **DISTRICT PLAN PROVISIONS**

38. A number of activities are introduced in Rule 19.3.2. which establishes activity statuses for various land use activities that range from permitted to discretionary which are intended to discourage the demolition, removal, alteration of existing dwellings and buildings fronting the street in order to protect existing historic heritage values that existing with an HHA whilst also enabling some activities through a consenting process such as for new dwellings and fencing.
39. As noted earlier, the Building Height provisions are covered within Plan Change 12. Rule 19.4.5 sets maximum heights for front, corner and through sites. Within The Victoria Street commercial zone there is no maximum heights, within the underlying zone. Within HHAs for rear site there is an 8m height limit and maximum two storeys. For Front, corner and through sites all buildings shall have a maximum height of:
- The original height of the building on the subject site; or
  - The average of existing heights of buildings on adjacent sites, being the three sites on either side of the subject site or six sites on one side of the subject site
  - Whichever is higher
40. This is problematic for the proposed HHAs within commercial area and residential when underlying zones such as the central city has unlimited heights.
41. Mr Knott advises that a buffer zone rule is not possible in regards HHAs, however as Ms McAlley of Heritage New Zealand submits that there should be a rule for adjacent to historic heritage is important, and should be included in the rule framework. The impact of inappropriate scaled buildings against sites and places, buildings, and historic areas, will potentially diminish heritage values. In proposed historic areas this is an important consideration. The proposed rule framework has not been sufficiently considered in this regards.
42. Control on heights in town or commercial historic area is important to retain the form and scale and allow for a continuation of how the historic area is seen. Other examples such as Jackson Street HHA Petone and Napier Historic Area include controls on historic commercial heritage areas. Specific rules for commercial areas such as the three proposed (Victoria, Frankton and Claudelands) are important to have setbacks and height controls that keep the integrity of the predominantly one or two storey shops. Placement of storeys above historic shops is of concern and will impact on heritage values site by site and cumulatively in my view,
43. Rules which are specific to commercial HHAs should include reference to shop fronts which is a critical element of a historic shop, and if identified as removed can be improved by an understanding of what is an appropriate heritage based solution.

44. Alterations and additions on rear sites can have an impact on the values of the HHA the recommended changes to Chapter 19 makes this a Restricted Discretionary Activity, rather than Permitted as was the case in the notified plan. For instance, the increase in height of a building on a rear site could have an impact on the historic heritage values of a front site and the HHA as a whole.
45. Demolition and relocation off rear sites can have a significant effect on the heritage values of the area, so the recommendation to alter this from a Permitted to Restricted Discretionary activity is preferable rather than the notified version of the plan change.

## DEFINITIONS

46. In my view definitions are helpful in both planning and when understanding the range of components that make up historic heritage. In the absense of a definition of HHA (as now proposed) further definitions would be appropriate for understanding the complex language of historic heritage, and allow for inclusion of a wider range of areas to be included.
47. While the shift to development periods these are very open and general, and again another new term. With existing RMA definitions and Heritage New Zealand definitions these would help with range, type and the layers of cultural heritage both tangible and intangible.
48. The following definitions would help with understanding elements and terminology within historic areas including :
- a. Contributing contributing buildings, structures or features: buildings, structures or features within the extent of a scheduled HHA that have heritage value or make a contribution to the significance of the area.
  - b. Feature: a physical entity within a scheduled historic heritage place that is discernible as an individual element within the place. A feature can be an archaeological feature, such as pits, terraces or a midden; a building, object (not including a moveable chattel) or structure.
  - c. Non-contributing buildings, structures or features: properties, places or features are either not relevant to, or may detract from, the values for which an area has been scheduled, or have the potential to adversely affect the heritage values of the place through future use and development.
  - d. Setting: elements of the surrounding or spatial context within which a historic heritage place is experienced, including sea, sky, land, structures, features, backdrop, skyline and views to and from the place. Setting can include landscapes, townscapes, and streetscapes and relationships with other historic heritage places which contribute to the value of the place.

## HERITAGE LANDSCAPE AND SETTING AND CONTEXT

49. In my view, the protection given by [s 6\(f\)](#) of the RMA extends to the curtilage of the heritage item and area, the surrounding area that is significant for retaining and interpreting the heritage significance of the heritage. This may include the land on which a heritage building is sited, its precincts, built landscape and the plantings surrounding the heritage item, and can also be a site that maybe without buildings and structures. This principle should be



applied as a buffer, particularly relevant when PC12 has major implications of scale against single storey places adjacent to both proposed residential and commercial historic areas.

50. It is important that a rule and assessment framework correctly anticipates and manages all effects generated in the built environments sought through the objectives and policies of a plan. I consider that the proposed intensification requires the existing approach to the management of the effects on historic heritage to be amended to ensure the finite historic heritage resource is appropriately protected.
51. Until recently most residentially zoned sites in Hamilton have only provided for one to two levels of development, and typically this was unlikely to cause adverse effects on identified historic heritage values when on an adjacent site. Rules and assessment have been typically confined to impacts caused by those undertaking additions and alterations or locating a new building on site (e.g. ancillary dwelling). The introduction of qualifying matters is recognition that intensification does have an impact on historic heritage, and this will assist to manage effects on the historic heritage sites at the time of additional development, however this will not manage the effects from intensification on an adjacent site. Adverse effects from taller, more intensive development adjacent to HHA areas will diminish historic heritage values.
52. Consideration should be given to historic heritage values when development occurred on an adjacent site. This is consistent with the approach of PC 9 as notified, where the plan change had provided for the consideration of the possible impacts that the greater density development may impose on sites in terms of bulk, dominance, height and ETC but not applying any controls on adjacent sites to an HHA.
53. Assessment criteria (or policy) around *Integration with neighbouring residential development through consistency of façade treatment, including building proportions, detailing, materials and landscape treatment*. – with supporting District Plan rules would be appropriate.
54. There may be an issue as to whether consideration of the effects of development on adjacent historic heritage values extending beyond the boundary of an HHA within this Plan Change – in my view it is giving regard to an RMA Part 6 matter; the protection of historic heritage from inappropriate subdivision, use and development, and providing an opportunity for a consideration of impacts on historic heritage values, similar to the consideration afforded by this plan change in relation to a number of matters, impacting on all sites adjacent to the new proposed, more intensive residential development permitted under PC 12.
55. It is important of evaluating the relationship of historic heritage (items, buildings and areas) with their context and other surroundings, such as the nearby parks, site landscape design and structures associated with a site.
56. A heritage landscape plan along with the architectural assessment forms an integrated approach to defining a historic area and its significant elements, and providing guidance for both protection and in non-regulatory guidance. Heritage landscape is identified as important in existing special character zones documentation and reports such as in the Frankton Railway Village and Hayes Paddock. This is highlighted when considering the front yards of Hayes Paddock sites or fencing in the Railway Village. In my view a heritage

landscape report and incorporation within a HHA conservation plan is critical to retain elements which may otherwise be considered non heritage.

57. Hamilton has many historic trees that are directly associated with historic farms and homesteads, and sites, including of historic regional significance. It can form setting and curtilage and in its own right be historic heritage as an item, grouping or area. No examples have been included in the city-wide review, although identified in management plan processes.
58. Built and planted landscape forms part of a city-wide historic study and of a historic area, and has been undertaken by other councils. It should be part of an integrated assessment process, identification and incorporation of appropriate rules. A survey in conjunction with Notable Trees would have provided information for assessment under STEM and forms approximately 1/3 of the assessment as advised by Mr Adam. It would support ongoing sustainable management of the finite resource which can be setting, contribute with a HHA or historic heritage HHA it is own right.
59. Dr Gui in his expert evidence considers the town belt as a historic area. This is an example that has been previously identified to council, and would align with other councils were historic parks and gardens such as in New Plymouth, Auckland and Christchurch are historic areas. It demonstrates an example of built landscape that is identifiable and should be included.

## **CONCLUSION**

60. The proposal to include historic heritage areas within PC9 is significant and will readdress existing national heritage areas under existing Special Character Zones. The identification of further HHAs and inclusion of submitter HHAs will provide ongoing protection over the Waikato's limited built heritage. There are however gaps which do not represent significant development themes in the city based on industry and agriculture as a service city for the region, of which several have been identified.

Dated this day of 28<sup>th</sup> April 2023.

Laura Liane Kellaway

## Appendix 1 -

## **Stepping forward to look back: Heritage conservation areas and the recognition of the heritage values of place**

**Josie Schroder<sup>1</sup>, Dr Ann McEwan<sup>2</sup>**

<sup>1</sup>Urban Opera, Tauranga, NEW ZEALAND

<sup>2</sup>Heritage Consultancy Services, Hamilton, NEW ZEALAND

**Proposed Theme(s) for Abstract:** Raising the bar/Planning for successful heritage outcomes

Historic heritage identification by territorial authorities combines best practice resource management assessment with an awareness of community expectations around heritage protection and interpretation. In the past many local authorities have focussed upon the identification and protection of individual heritage items, in tandem with the recognition and management of local area character and amenity. Heritage conservation areas offer a more holistic means of identifying and protecting historic heritage values as required by statute, while also meeting community objectives in relation to local identity and environmental protection.

A heritage conservation area may be broadly applied to any distinctive environment in which historic heritage values are embodied; provided it has a good level of physical integrity; can communicate the heritage story of the place's development; has heritage values which are defensible within the context of the RMA; and meets established heritage assessment criteria. Generally a heritage conservation area will incorporate both public space and private property and acknowledge the wider physical and historical context in which it is located.

In New Zealand the Resource Management Act (RMA) provides a definition of what 'historic heritage' is and establishes that its sustainable management is a matter of 'national importance'. Historic heritage is defined as '[t]hose natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:

- (i) archaeological;
- (ii) architectural;
- (iii) cultural;
- (iv) historic;
- (v) scientific;

(vi) technological; and includes

(a) historic sites, structures, places, and areas; and

(b) archaeological sites; and

(c) sites of significance to Maori, including waahi tapu; and

(d) surroundings associated with the natural and physical resources.

A key point to note here is that the primary focus is upon resources that embody New Zealand's history and cultures, i.e. it is the narrative of history that is the motivation here rather than simply the conservation of a physical entity. Also of note is that surroundings are specifically mentioned in conjunction with the structures (buildings) and sites that are most commonly thought of as heritage resources.

The District/City Plan prepared by each territorial authority is the chief tool with which these councils address the identification and protection of local historic heritage resources. Commonly the Heritage chapter of a District/City Plan will contain a schedule of individual buildings, sites and places that are acknowledged for their historic heritage value. The owners of scheduled buildings and sites are then governed by the rules laid out in the Plan. Individual scheduling focuses attention upon a specific site or structure and its story but this approach may overlook the wider context of that particular scheduled item and ultimately lead to the degradation of the environment from which the building or site derives its meaning and value. District/City Plans more commonly recognise the visual character and amenity of neighbourhoods and areas, rather than their heritage values. In this case aesthetic coherency and homogeneity will likely be emphasised over the diversity and heterogeneity that generally arises out of historic patterns of use and development.

Heritage conservation areas, also sometimes known as historic areas, can be effectively used to recognise and protect the historic heritage values of a locale in which there are located a number of significant individual heritage items or where an important aspect of a community's history and identity is embodied. For example, planned residential environments, such as the Labour Government's state house subdivisions of the late 1930s and 1940s, may be readily identified as heritage conservation areas and their common vocabulary of building styles, materials, setbacks and garden settings protected within the District/City Plan. Less homogenous areas, such as commercial areas or areas of upper class housing that have developed over time, may initially be more challenging for policy and consent planners but their value to the community may be very high. Such areas can also

encompass character values and therefore demand sophisticated urban design responses that are best based upon a sound knowledge of their historic genesis as the basis of, not in addition to, local character values.

Undertaking the identification of heritage conservation areas calls for a multi-disciplinary approach, based upon a sound knowledge of the underlying history of an area and using assessment criteria that are aligned with the RMA definition of historic heritage. The criteria should be consistent with those used to identify individual heritage items for scheduling in the District/City Plan and identification should proceed from a best practice thematic assessment framework<sup>1</sup> that does not privilege age and architectural pedigree over other considerations. Or, to put it another way, the story of New Zealand's history and cultures is obviously not entirely captured by architecturally designed Victorian and Edwardian housing for the upper middle class, and so best practice historic heritage identification and protection seeks to acknowledge the diversity of circumstance and experience of all New Zealanders.

Heritage conservation areas may be highly individual, for example a mixed-use village hub in which the physical environment has determined the position of roads and the containment of individual properties between water bodies and courses. For example, in Akaroa there are two such hubs, which owe their form to both environmental and cultural factors arising out of the settlement's colonial Anglo-French origins.

If the focus is on environments that are primarily residential or commercial in nature, a heritage conservation area may be identified that represents historic heritage values that are also found in other parts of a town or city. In Christchurch a matrix of different residential circumstances and experiences, including: living on the flat or on the hills; upper class or working class neighbourhoods; 19<sup>th</sup> and 20<sup>th</sup> century housing styles and subdivision patterns; private or government housing development for example, encourages the identification of a cluster of heritage conservation areas that not only have intrinsic value but also embody shared narratives that may be communicated across the city.

As much as historic heritage identification is directed towards protection, it is also important that territorial authorities keep in mind the importance of recording and communicating the heritage values and narratives of their communities so that, hopefully, better environmental outcomes arise voluntarily rather than solely by

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<sup>1</sup>New Zealand Historic Places Trust's *Heritage Management Guidelines for Resource Management Practitioners* [2004, pp. 65-67] and  
The use of thematic frameworks for management and interpretation in *Science for Conservation* 285  
by Peter Clayworth for Department of Conservation.

regulation. Arising out of this activity should be the recognition of emerging or future heritage conservation areas that may embody heritage values the community does not easily recognise. Interpretation, closely aligned with the identification of heritage conservation areas, is therefore fundamental to promoting community understanding of and support for council efforts in this area.

Of course regulation to achieve positive historic heritage identification and protection outcomes will no doubt continue to be necessary as long as District Plans exist. In this case city and district councils need to take a multi-disciplinary approach to historic heritage identification, bringing together expert knowledge in social history, architectural history, landscape history, archaeological and iwi history. Local iwi and hapu (tribes and sub-tribes) may elect to undertake their own historic heritage assessment in partnership with local councils, but good historic heritage outcomes will proceed from an appreciation of the historic continuum in which pre-European indigenous, settler and post-colonial societies all play a part.

While community expectations may be the catalyst for undertaking a heritage conservation area identification project, councils should always be mindful of the need for heritage outcomes to be robust, consistent and defensible. Hence the need for clear and concise assessment criteria as well as a project methodology that can be effectively defended and communicated.

Heritage protection may be achieved through District/City Plan scheduling or under the auspices of other policies and plans such as Reserve Management Plans and Development Codes. Effective alignment between protection mechanisms is essential for achieving robust heritage outcomes and raising awareness of historic heritage values. In the case of council cemeteries and reserves, for example, it is important that historic heritage values are adequately acknowledged and their management addressed so that the territorial authority can demonstrate its own adherence to the objectives, policies and rules promulgated in the District Plan. Where ecological and historic heritage values may come into conflict, such as with the reintroduction of native plantings versus the conservation of exotic species, it is important that good decisions arise out of sound historic heritage information and analysis.

The implementation of heritage conservation area identification and protection by territorial authorities, based on best practice thematic assessment and underpinned by an effective communication and interpretation strategy, has the potential to achieve better and more proactive historic heritage outcomes. By including heritage conservation areas within their planning toolbox local bodies can not only address community concerns about the ongoing loss of heritage buildings, sites and structures, but also raise the standard of knowledge about what constitutes historic

heritage fabric and values. The heritage conservation area template developed for Christchurch City Council has much to offer councils wishing to fulfil their obligations under the RMA in a manner that is not only robust and defensible but also, perhaps even more importantly, interesting and accessible.

Me huri whakamuri, ka titiro whakamua

In order to plan for the future, we must look to the past