

**Before the Hearings Panel  
Appointed by Hutt City Council**

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

**AND**

**IN THE MATTER** of Hutt City Plan Change 56

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**STATEMENT OF EVIDENCE OF DEAN RAYMOND ON BEHALF OF  
HERITAGE NEW ZEALAND POUHERE TAONGA**

**HUTT CITY PROPOSED PLAN CHANGE 56**

**Planning Statement**

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**29 March 2023**

1. My name is Dean Philip Raymond, and I am employed as Manager and Planner for Heritage New Zealand Pouhere Taonga (HNZPT) based in the Central Region Office, Wellington. I hold the qualification of Bachelor of Regional Planning from Massey University (graduated 1987). I am a full member of the New Zealand Planning Institute. My current role includes providing statutory planning advice in relation to proposals under the Resource Management Act (RMA). I have been in this role for over 2 ½ years.
2. I have over 14 years' experience in planning and resource management roles in New Zealand. My previous roles include working as a consultant planner in the Wellington region, and as a resource consents planner at Kapiti Coast District Council. I have previously presented evidence at district plan hearings, resource consent hearings and at the Environment Court.
3. Although this evidence is not prepared for an Environment Court hearing I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and have complied with it in when preparing this evidence. I have considered all the material facts that I am aware of that might alter or detract from the opinions I express. This evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.
4. HNZPT made a submission on proposed Plan Change 56 (PC56). I was involved in preparing the submission. The HNZPT submission related mainly to the residential heritage precincts proposed in the plan change. I have been asked by HNZPT to assist by providing planning evidence on PC56.
5. In preparing this evidence I have read the relevant submissions, further submissions, and the Section 42A reports prepared by Council staff and/or consultants.
6. The scope of my evidence covers:
  - General comments on matters related to heritage;
  - The spatial extent of Jackson Street Heritage Precinct and Heretaunga Settlement Heritage Precinct; and
  - Naenae Civic Centre.

## **Heritage Matters**

7. HNZPT submitted requesting that a plan change be prioritised incorporating additional provisions for the protection of heritage values of the Residential Heritage Precincts.
8. I acknowledge the Section 42A Authors' comments that a more comprehensive review of the Residential Heritage Precinct is being undertaken as a part of the full District Plan review (paragraph 490). I also acknowledge the comment in paragraph 481 of the 42A report that, with regard to the Residential Heritage Precinct, only the protections afforded under an IPI can be applied to the precincts, which is limited to changing building heights and densities to protect the historic heritage values of these areas. The control of other activities (including demolition of all or part of a building) is outside the scope of what an IPI is able to address.
9. I agree with this assessment of the limitation of the IPI's application and that the additional protections or restrictions relating to these new Residential Heritage Precincts will be addressed as part of the full District Plan review.
10. The HNZPT submission point on the introductory text of the High Density and Medium Density sections is amended has been recommended to be accepted (paragraph 493). I support this recommendation, as the amendment will more clearly identify which precincts are situated in which zone.

## **Jackson Street Historic Precinct**

11. Paragraphs 725 to 730 in the S42A Report address the extent of the Jackson Street Historic Precinct in the context of Petone Commercial Activity 'Area 1'. I agree with the comment in paragraph 727 that the constraint on development can only be justified with the presence of a qualifying matter.
12. I agree with the comment in paragraph 736 that increasing the height control in Area 1 of Petone from 22m to 53m would facilitate pockets of higher development surrounded by buildings of much lower heights. If this were to occur, then it could result in potentially adverse effects on the heritage values of the Jackson Street Heritage Precinct.
13. In paragraph 872 the 42A authors recommend that the submission from HNZPT to amend the wording of 'Residential Heritage Precinct' be accepted. I agree with this recommendation.

14. The 42A authors (paragraph 876) support the change to the activity status of a subdivision of land containing a scheduled heritage item. Subdivision of sites containing historic heritage or sites of significance to Māori have the potential to create adverse effects on the heritage values of these sites. For this reason, I support the recommended changes to Rule 11.2.4 outlined in paragraph 886.
15. I have considered the commentary relating to the protection of historic heritage from inappropriate subdivision, use, and development as a qualifying matter (paragraphs 968 to 1039 of the 42A report). I accept and agree with the approach taken in this plan change to recognise and provide for historic heritage as a qualifying matter, applying to the heritage buildings, sites and areas currently identified in the operative plan, and the additional heritage precincts proposed in PC56. It is apparent that the approach taken in PC56 is based on a comprehensive and evidence-based assessment to including the protection of historic heritage from inappropriate subdivision, use, and development as a qualifying matter. The assessment I am referring to includes the Heritage inventory Report August 2022 – Sub-Report for Plan Change 56, and the Section 42A report of Ms Stevens.
16. I have also noted the comments on ‘voluntary heritage’ (paragraphs 980 – 988), and the legal opinion on the proposition that heritage can only be protected if the owner is in agreement. I agree with the 42A authors that the legal advice ‘sums the issues up well’ and I agree with the recommendation in paragraph 988.
17. In paragraph 991 the 42A authors address the HNZPT submission on Riddlers Crescent Heritage Precinct. The HNZPT submission requested that Riddlers Crescent be included in Appendix Heritage 3, alongside Jackson Street, Heretaunga Settlement, and Lower Hutt Civic Centre. I acknowledge the fact that Riddlers Crescent is to be retained as a Heritage Precinct in Section 4G 5.3. I agree with the authors that this essentially retains the status of the Riddlers Crescent Area/Precinct in the Operative District Plan As such I agree with the recommendation on this submission point, and that the Riddlers Crescent provisions can remain as notified.
18. I have considered the recommendations relating to the extents of certain heritage precincts – the eastern end of Jackson Street (HA-04) and both northern and southern edges of Heretaunga Settlement Heritage Precinct (HA-02). Mr. Reuben Daubé has provided a

statement of evidence in which he expresses agreement with the findings and recommendations of Ms Stevens.

19. I also agree with these recommendations, with one further comment regarding 327 Jackson Street. My understanding is that resource consent has recently been granted for construction of a three storey apartment building on this site. Any granted consent should be considered in future assessments as this will form part of the existing environment.

### **Naenae Civic Centre**

20. I have one further comment on the Heritage Areas / Precincts proposed under PC56: in paragraph 18 of Ms Steven's evidence she states that seven Heritage Areas were proposed following completion of the Desktop Heritage Inventory Review in 2021. Six of these proposed areas are included in PC56, with the exception being Naenae Civic Centre. The balance of Ms. Steven's evidence is silent on the heritage status of Naenae, and no explanation is provided as to why this area 'dropped off' the list of proposed Heritage Areas.
21. I acknowledge that Naenae has been identified in PC56 as particularly suitable for 'taller development' (42A paragraph 1212). However as the Desktop Heritage Inventory Review has identified Naenae as having heritage value, it would appear that the statement in paragraph 249 that Naenae 'does not have heritage constraints' is not accurate.
22. The heritage values of Naenae have been recognised through a number of reports undertaken and/or commissioned by Heritage New Zealand Pouhere Taonga. Mr Daubé has provided further comment on these matters in his statement.



**Dean Raymond**

**29 March 2023**