

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

IN THE MATTER of the Resource Management
Act 1991

AND

IN THE MATTER of Wellington City Proposed
District Plan

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

WELLINGTON CITY PROPOSED DISTRICT PLAN – HEARING STREAM 1

Planning Statement

3 February 2023

INTRODUCTION

1. My name is Dean 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.

SCOPE OF EVIDENCE

4. HNZPT made a submission and further submissions on the Wellington Proposed District Plan (PDP). I was involved in preparing the original submission on the PDP and also the further submission. I have been asked by HNZPT to assist by providing planning evidence on the PDP.
5. In preparing this evidence I have read the relevant submissions, further submissions, and the Section 42A reports prepared by Council staff.
6. Only two submission points made by HNZPT are addressed in the 42A report for hearing Stream 1 – that a definition of 'overlay' be included in the PDP, and amendments to the glossary entries of Wāhi Tapu, Wāhi Tīpuna, and Wāhi Tūpuna. I will address both of these issues in this statement.

DEFINITION OF OVERLAY

7. The original HNZPT submission requested that a definition of *overlay* be included in the PDP. The submission stated that such a definition would *improve the meaning of these clauses for the convenience of plan users*. The submission suggested that the Wellington PDP follow the example of the Porirua PDP, which includes a definition of *overlay*.
8. The author of the 42A report states that a definition of *overlay* is not necessary (page 147). He points out that the effect of an overlay is adequately explained in the 'Relationship Between Spatial Layers' chapter. This chapter includes descriptions of the various spatial layers used in the PDP (including zones, precincts, and overlays) and how these layers are applied in the plan. The 'Explanation of Overlays' section of this chapter includes a detailed explanation of how overlays are applied and the relationship between overlays, zones and precincts.
9. I agree with the 42A author that the guidance contained in the 'Relationship Between Spatial Layers' chapter is sufficient to provide clarity and understanding for plan users, and that a definition of overlay is not necessary.

GLOSSARY: WĀHI TAPU, WĀHI TĪPUNA and WĀHI TŪPUNA

10. HNZPT submitted that the terms Wāhi Tapu, Wāhi Tīpuna and Wāhi Tūpuna in the PDP should be consistent with how these terms are defined in the Heritage New Zealand Pouhere Taonga Act 2014. The HNZPT submission requested that the terms in the PDP glossary be replaced by the terms used in the HNZPT Act. For clarity I also note that Section 6 of the HNZPT Act states that the terms Wāhi Tīpuna and Wāhi Tūpuna (and Wāhi Tipuna / Wāhi Tupuna) are used interchangeably.
11. The 42A author (in paragraph 756) recommends that changes to the glossary are made in line with the HNZPT submission. The author states that 'there is no resource management issue specific to Wellington City why the plan terms should be different'.

12. Te Rūnanga o Toa Rangatira has opposed the HNZPT submission. The stated reason for the opposition is that *the notified definitions are appropriate*.

13. At this stage, in the absence of any further explanation or evidence from Te Rūnanga o Toa Rangatira, I am of a mind to agree with the 42A author, that the glossary terms should be consistent with the HNZPT legislation. However, if Te Rūnanga provide evidence or an explanation of their position (that the definitions as notified are more appropriate than the definitions in the HNZPT Act), I would like to have the opportunity to modify my view.

A handwritten signature in black ink, appearing to read 'D. Raymond', with a stylized flourish at the end.

Dean Raymond

Planner

3 February 2023