
Section 32 Report for the Proposed Waitomo District Plan

Section 32 Report – Historic Heritage

SUMMARY OF ISSUES	RESOURCE MANAGEMENT ACT 1991	NATIONAL DIRECTION	REGIONAL POLICY STATEMENTS	IWI MANAGEMENT PLANS CONT...
<p>The principal pieces of legislation that manage historic heritage in New Zealand are the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT) and the Resource Management Act 1991.</p> <p>Heritage places, buildings and structures play a very important part in our communities because they offer an understanding of our history and culture and provide us with a sense of place and identity. Council is required by the Resource Management Act 1991 (RMA) as a matter of national importance, to protect historic heritage. The current district plan identifies 11 buildings and structures. Each of these is listed by Heritage New Zealand and all of them are located around Te Kūiti and Waitomo Caves Village. The PDP identifies a total of 38 buildings and structures from all over the district. They range from monuments to churches, tunnels, bridges, cottages and halls. Each building or structure was either nominated by local people, museums or heritage societies or identified by our heritage consultants.</p> <p>All buildings and structures were assessed by our heritage consultants. Many nominated buildings did not meet the criteria, but some had such special values or associations that they were included on the heritage schedule. The criteria used to assess the sites is based on the Waikato Regional Policy Statement.</p> <p>In addition to heritage building and structures the PDP identifies a group of significant archaeological sites. These sites have been identified as their values require protection both under the Resource Management Act and the Heritage New Zealand Pouhere Taonga Act (HNZPT) 2014</p> <p>The historic heritage chapter addresses the following issues:</p> <ul style="list-style-type: none"> Historic heritage needs to be recognised, and correctly identified before it can be protected Recognition of the important contribution historic buildings /structures / places make in different areas of the district is not provided by the list of protected buildings and structures in the Operative District Plan including buildings / structures of high community and commemorative significance. There are some sites of high archaeological significance within the district that are not currently recognised and protected. Subdivision, use or development of a site (including the placement of signs, modification of scheduled buildings or structures) can affect heritage values, 	<p>Section 5 <u>Protecting historic heritage is important for people's and communities social and cultural wellbeing (Section 5). It provides a legible record of the past to help present and future generations understand social change over time. Balancing protection whilst considering adverse effects on use and development of natural and physical resources goes to the heart of Section 5(2) of the RMA.</u></p> <p>Section 6 RMA Section 6(f) the protection of historic heritage from inappropriate subdivision, use, and development: is relevant to this topic.</p> <p>Section 6 matters are required to be recognised and provided for within district plans. To carry out this responsibility the Council, in preparing this plan, must identify and protect the historic heritage resources within its district from inappropriate subdivision, use and development.</p> <p>Section 7 RMA Section 7 lists a range of other matters that particular regard is required to be given to.</p> <p>Section 7(aa) The ethic of stewardship</p> <p>This matter refers to an inherent need to be responsible in managing natural and physical resources for future generations. In respect of historic heritage resources, this matter is about maintaining places and buildings that have historic heritage values so future generations have an appreciation and understanding of the past.</p> <p>Section 7(b) the efficient use and development of natural and physical resources.</p> <p>This matter includes the efficient use and development of land and buildings. The identification of historic heritage resources will affect the way in which land can be developed. This matter provides direction to accurately identify and assess heritage values. In addition, it directs and promotes the on-going use of heritage buildings or structures. On-going use is important as it reduces the potential for demolition by neglect. For these reasons it is important that activities within heritage buildings should not be unduly restricted where they are appropriate and consistent with the purpose and principles of the RMA.</p> <p>Section 7(c) the maintenance and enhancement of amenity values.</p> <p>Buildings and structures of historic heritage value contribute to the amenity values of an area. Alterations, additions, and new buildings on the site and surroundings of a heritage building can detract from the contribution that historic heritage makes to amenity. This matter provides direction that amenity values should be maintained or enhanced, and therefore not degraded by alterations, additions, and new buildings.</p>	<p>There are six National Policy Statements (NPSs) currently in place:</p> <ul style="list-style-type: none"> New Zealand Coastal Policy Statement 2010 NPS for Electricity Transmission 2008 NPS for Renewable Electricity Generation 2011 NPS for Freshwater Management 2020 NPS on Urban Development 2020 NPS for Highly Productive Land 2022 <p>There are also 8 National Environmental Standards (NESs) currently in place:</p> <ul style="list-style-type: none"> NES for Air Quality 2004 NES for Sources of Human Drinking Water 2007 NES for Telecommunication Facilities 2016 NES for Electricity Transmission Activities 2009 NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 NES for Plantation Forestry 2017 NES for Freshwater 2020 NES for Storing Tyres Outdoors 2021 <p>There are no relevant NPS's or NES's that are relevant to this chapter.</p> <p>Relevant case law considered Council has reviewed relevant Environment Court cases regarding heritage, specifically:</p> <ul style="list-style-type: none"> Waikato Community Trust Inc v Hamilton CC [2015] NZEnvC 19. Redmond Retail Ltd v Ashburton District Council [2020] NZEnvC 078; and <p>It is considered this case law provides direction about the importance to strike a balance between the protection of a heritage building and the financial pressures of maintaining a heritage building. It also provides direction to accurately identify the heritage values of the building or structure or part thereof. In Waikato Community Trust v Hamilton City Council, the compromise was to allow mixed commercial / business use in the area including the heritage building. In Redmond Retail the Court found it is reasonable to expect the heritage listing to apply to the building / area or part thereof that has the heritage values. In this case the Council had applied the listing to the whole building when the heritage values were only present in the original part of the building.</p>	<p>The Waikato Regional Policy Statement contains the following relevant provisions for historic heritage Policy 10.1 refers to the need for collaboration and consistency in the management of historic and cultural management.</p> <p>Implementation methods associated with this policy refer to the Waikato Regional Council facilitating the establishment of a regional heritage forum and a regional heritage inventory. The forum has been established and Waitomo District Council have participated in it. A regional heritage inventory is yet to be established. However, in assessing heritage items for this plan, the criteria in section 10A were used as a basis. Consequently, the work completed for the PDP could be included within a regional heritage inventory when it is established.</p> <p>The implementation methods for Policy 10.3 require district plans to provide for the protection of historic and cultural heritage from inappropriate subdivision, use and development. In determining what is appropriate the method provides a list of criteria that regional and district plans are required to have regard to. The criteria are matters that have been considered and, in most cases, included within the provisions of this Plan.</p> <p>Manawatu-Wanganui One Plan: There are no listed buildings/structures/significant archaeological sites within SCHED1 or SCHED2 located within the Manawatu-Wanganui Regional Council part of the district.</p>	<p>A summary of the provisions in the Waikato Tauiwi Environment Management (WTEP) Plan 2018 relevant to the protection of Historic Heritage are as follows: Section 16 requires site management protocols to be in place in the event wāhi tapu and other tāonga tuku iho are discovered. The accidental discovery protocol included within the plan assists as it provides a basis for site specific management protocols which can be worked through at the time of resource consent. No amendments to the accidental discovery protocol included within the plan were requested during the pre-notification process. The remainder of Chapter 16 of the WTEP is considered further in the section S32 assessment for the Chapter on Sites and Areas of Significance to Maori.</p> <p>The proposed Historic Heritage provisions take account of the relevant provisions in the WTEP, as they provide a process for accidental discovery and recognise the cultural values associated with the significant archaeological sites.</p>

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<p>resulting in a loss of knowledge and links to the past.</p> <ul style="list-style-type: none"> Listing of a building or structure places an administrative cost on landowners and occupiers. 	<p>Section 7 (f) maintenance and enhancement of the quality of the environment.</p>			
<p>OPERATIVE WAITOMO DISTRICT PLAN</p>	<p>Given the definition of 'environment' in section 2 of the RMA: additions, alterations and new developments have the potential to affect the quality of the receiving environment through adverse effects on historic heritage values s6(f) and amenity values as noted above. This matter provides direction that the quality of the environment (natural and physical resources) should be maintained or enhanced by any development or redevelopment of a site containing a SCHED building /structure/ place of historic heritage. It also provides direction that careful consideration and due care needs to be taken of developments on other sites, particularly adjacent sites, that may adversely affect the quality of the environment.</p>		<p>IWI MANAGEMENT PLANS</p>	<p>OTHER RELEVANT PLANS OR LEGISLATION</p>
<ul style="list-style-type: none"> Schedule 1 and 2 of the ODP lists buildings and structures that are also listed by HNZPT. Schedule 1 contains 1 item and is called Heritage Sites of National Significance. Schedule 2 contains 15 items and is called Heritage Sites of District Significance. The rules provide for minor work, signs on buildings in a Business Zone where they comply with the appropriate rules and interpretive signs. All other work or activities that affect a listed building or structure require resource consent as a discretionary activity. Except for the demolition of Schedule 1 items which require consent as a non-complying activity. Schedule 3 contains a list of known archaeological sites. Rules in the ODP require consent for a discretionary activity when any of the listed archaeological sites are proposed to be altered or destroyed. On the ODP Planning Maps there are additional places identified as 'Heritage Sites'. The alteration or destruction of these places requires resource consent for a discretionary activity. Refer to the Chapter on Sites and Areas of Significance to Maori (SASM) and the associated section 32 regarding these. 	<p>Section 7 (g) Any finite characteristics of natural and physical resources</p>	<p>By their very nature historic heritage resources have finite characteristics. Some historic heritage resources in the district are exceedingly rare, as there were never many of those type of structures built. This value has been considered as part of the heritage building and heritage structure assessment process. When a rare buildings or structure is in bad repair there needs to be a balance between protecting a building and enabling people reasonable use of land.</p>	<p>The Council is required to take into account planning documents recognised by an iwi authority and lodged with the territorial authority (S74(2A)).</p>	<p>The NZHPT is directly relevant to this section of the PDP. This Act establishes:</p>
<p>SCALE & SIGNIFICANCE s32(1)(c)</p>	<p>Section 8 RMA There are no section 8 matters relevant to this topic.</p>	<p>The PDP has not included a list of current archaeological sites and has not identified archaeological sites on the planning maps. The reason for this is that information on the NZAA database is constantly changing. The Council instead has chosen to display archaeological site information on the Council's online maps accessed from their website. This data layer will be updated monthly. In this way people have access to updated information, reducing risks associated with accidental or unintended destruction. Reference to the Council's website is made within the Historic Heritage chapter of the PDP.</p>	<p>A summary of the provisions in the Maniapoto Iwi Environment Management Plan 2018 (MEMP) relevant to the protection of Historic Heritage are as follows:</p>	<ul style="list-style-type: none"> a framework to recognise places of historical, cultural and ancestral significance and provides criteria for places to be included on Heritage List / Rārangī korero; and overarching protection and a regulatory process for land occupied pre-1900.
<p>The assessment is based on eight factors outlined in Ministry for the Environment's guidance on Section 32 reports. Each factor is scored in terms of its scale and significance (where 1 is low and 5 is high).</p> <p>Reason for Change: 2 Problem / Issue: 2 Degree of Shift from Status Quo: 2 Who and How Many Affected, Geographic Scale of Effects: 1</p>		<p>The MEMP also seeks for appropriate protocols to be in place in respect of accidental discovery. The Chapter on Historic Heritage includes an accidental discovery protocol. The purpose of the protocol is to make people aware of their responsibilities under the HNZPT . It contains the steps to be followed in the event of an accidental discovery. The steps include notifying the appropriate iwi groups or kaitiaki who have authority over the process. No amendments to the accidental discovery protocol were requested during the pre-notification process.</p>	<p>Maniapoto seek to participate at the highest levels of decision making for matters that affect cultural heritage. Maniapoto representatives have been partners in the approach taken to identify sites and areas of significance to Māori but not so for heritage buildings (Refer to section 32 for Sites and Areas of Significance to Māori). Maniapoto representatives did not consider it was possible to prioritise one archaeological site over another so chose not to be involved in the selection of significant archaeological sites to be included in the district plan.</p>	<p>The places included on the Heritage list do not automatically have protection from alteration or destruction. The rules within resource management plans provide for protection from such activities.</p>
		<p>It is considered the proposed provisions take account of provisions in the MIEMP, as they provide an accidental discovery protocol and recognise the cultural values of the identified significant archaeological sites. The chapter on Sites and Areas of Significance to Maori and the associated section 32 is directly relevant to the cultural heritage section of the MEMP.</p>	<p>The PDP does not seek to duplicate the authority process. Where an authority could be required under HNZPT and a resource consent under the RMA is where the site has been identified as having significant archaeological values that warrant protection under the RMA. This status applies to the 5 sites included within SCHED2. The only other time is where a building is included in SCHED1 that was constructed pre-1900. This is unlikely to occur because of the later date the King Country was occupied by colonial forces.</p>	<p>In respect of land occupied pre-1900, the PDP does not seek to duplicate the authority process. Where an authority could be required under HNZPT and a resource consent under the RMA is where the site has been identified as having significant archaeological values that warrant protection under the RMA. This status applies to the 5 sites included within SCHED2. The only other time is where a building is included in SCHED1 that was constructed pre-1900. This is unlikely to occur because of the later date the King Country was occupied by colonial forces.</p>
				<p>Section 74(2)(b)(iia) of the RMA requires in undertaking a plan review a territorial authority shall have regard to any relevant entry on the New Zealand Heritage List/Rārangī Kōrero required by the HNZPT . Regard has been had to the list in the preparation of this plan. The list of buildings in SCHED1 of this plan includes those within the Heritage NZ List. In some cases, the mapped extent shown on the planning maps is different than the legal descriptions included within the Heritage NZ List. The reason for this is to ensure the building or part thereof that has the heritage values is what is identified. This is consistent with the Environment Courts decision in Redmond Retail Limited v Ashburton District Council.</p>
				<p>STRATEGIC DIRECTION</p> <p>The following objective from the Strategic Directions Chapter of the plan is relevant to this topic:</p> <p>SD-O10: The buildings, structures, sites, areas, ecosystems, natural landscapes and features identified as having special qualities and values and which contribute to the district's sense of place and identity, are protected.</p>

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Degree of Impact on or Interest from Maori: 2 Timing and Duration of Effects: 1 Type of Effect: 1 Degree of Risk or Uncertainty: 1 Total (out of 40): 12				UNCERTAINTIES AND RISKS s32(2)(c) The degree of risk and uncertainty is low. The buildings and places are defined, and the approach taken for their management in the proposed provisions is well understood.
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OBJECTIVE(S) s32(1)(a)

Relevance – The proposed objective recognises and provides for the protection of historic heritage. It is directly relevant to section 6(f) of the RMA. The objectives also address the identified issues above.

Usefulness – The objective provides clarity as to what is to be achieved under section 104 when considering a resource consent application for any building / structure / place included within SCHED 1 or SCHED2. The objective provides an overall framework that allows the development of provisions to identify key matters in relation to the management of historic heritage. The provisions provide guidance as to what is appropriate / inappropriate subdivision, use or development.

Reasonableness – The objective will not create unjustifiably high costs to the community. The proposed list of buildings, structures and places in SCHED 1 and SCHED 2 identify buildings and places that have not been identified in the ODP. However, these sites have been consulted on with the community through consultation of the draft district plan, and as such are not considered to be excessive. The PDP also makes provision for exterior maintenance and repair and internal alterations, which are considered to provide reasonable options to building owners when considering alterations and upgrades to listed buildings.

Achievability – The objective is considered to be achievable, as it places importance on protection of historic heritage consistent with section 6(f) of the RMA and the provisions specify how the objective is to be achieved.

Are the objectives the most appropriate way to achieve the Purpose of the Act?
 The proposed objective is considered to meet the tests of relevance, usefulness, reasonableness and achievability. The objective is the most appropriate way to achieve the purpose of the RMA because it:

- Will provide for the protection of physical resources in this case buildings, structures, and places that have historic heritage values and are of community significance. In doing so it will promote the protection of historic heritage values for future generations (section 5(2)(c)); and
- Will address the requirement of section 6(f) to protect historic heritage; and
- Is within the jurisdiction of the Council and can be achieved within the exercise of its functions; and
- Will address the key resource management issues identified above.

PROVISIONS s32(1)(b)

EFFICIENCY & EFFECTIVENESS s32(1)(b)(ii), 32(2)(a)(i), s32(2)(a)(ii)	ALTERNATIVES s32(1)(b)(i)
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<p>Benefits Anticipated</p> <p><u>Environmental</u></p> <ul style="list-style-type: none"> • Historic heritage contributes to maintaining and enhancing the quality of the District’s environment. SCHED1 in the PDP contains additional buildings/structures than included in the ODP. The list contained in the ODP only includes those buildings/structures in the Heritage New Zealand list, which are mainly located in Te Kūiti and Waitomo Caves Village. The list in the PDP includes buildings/structures from Te Kūiti and Waitomo Caves Village as well as several other communities in the District. The list in the PDP will maintain and enhance the quality of the District’s environment within a wider range of the District’s communities than the ODP. The lists of heritage buildings and structures in ODP and PDP both contain 2 categories with the same levels of significance. • The ODP maps and Schedule 3 list all known archaeological sites at the time the ODP was notified (June 1999). Any person wishing to alter or demolish an archaeological site requires a discretionary activity consent. The PDP does not map or have rules on archaeological sites unless they have been assessed as being significant. Instead, the approach is to include the NZAA data layer on the Council’s online mapping tool. The NZAA data layer is constantly changing. This approach has the benefit of people having access to the most up to date information. The approach in the PDP also has the benefit of avoiding duplication with HNZPT processes. • The PDP provisions for SCHED1 Heritage Buildings and Structures focus on the external parts of the buildings and provide for maintenance and repair. This means the internal parts of the building can be altered and or reused without the need for consent. The provisions in the ODP do not make this distinction. • The provisions for SCHED1 also recognise the need for earthquake strengthening and only require consent where there is the potential for adverse effects. The ODP does not make specific provision for these types of activities and full discretionary activity consent is required. • The provisions in the ODP do not manage activities on the site or surroundings. This means there is the potential for buildings or other activities to occur that could potentially adversely affect the heritage values of the SCHED building / structure/ place. The PDP proposes to include provisions that manage these effects. • The provisions in the PDP provide a new restricted discretionary rule focused on the repositioning of buildings on the same site. This rule will provide some flexibility on some sites while still managing potential adverse effects. The ODP does not contain a similar rule. • In the ODP relocation of Category 1 heritage buildings/structures is a non-complying activity and a discretionary activity for Category 2 buildings. The same activity statuses are proposed for the PDP. The policies in the PDP provide a benefit in that they more clearly articulate the matters to be considered in any resource consent application. • Demolition of heritage buildings/structures in the ODP are non-complying activities for Category 1 buildings and discretionary activities for Category 2 buildings. The PDP proposes to make demolition of buildings in SCHED 1 non-complying activities. Non-complying activity status means the demolition of a SCHED1 building or structure needs to pass either one of the tests in Section 104D of the RMA. The tests being the adverse effects on the environment will be minor, OR the activity is not contrary to the objectives and policies of the Plan or Proposed Plan. Unlike the ODP the policies in the PDP provide clear direction as to the matters that need to be considered for any application. This provides a benefit as it clearly articulates the matters to be considered under section 104D. <p><u>Economic</u></p> <ul style="list-style-type: none"> • The provisions provide support for the reuse of buildings by permitting internal alterations, and excluding buildings listed in SCHED1 from various transport rules including parking and loading requirements, and exemptions from setback and insulation requirements that would otherwise apply to buildings adjoining a state highway. In addition, the subdivision chapter provides for the creation of a lot around a building or structure listed in SCHED1. • Removal of the discretionary activity rule in the ODP for all archaeological sites will reduce administrative costs and be more efficient. • Protecting and maintaining historic heritage can have economic benefits including tourism opportunities. 	<p>For the purpose of this evaluation, the Council has considered the following potential options: 1. The proposed provisions; and 2. The status quo.</p> <p>The ODP provisions are not considered to be efficient or effective in achieving the objectives.</p> <p>In order to identify other reasonably practicable options, the Council has undertaken the following:</p> <ul style="list-style-type: none"> - Reviewed other relevant district plan provisions for historic heritage; and - Discussed with iwi the possibility of nominating buildings or structures and prioritising archaeological sites. Advice from iwi is that it is not possible to prioritise one archaeological site over another as each site has its own korero which is not more important than another. No building or structure was nominated by iwi. - Sought feedback from staff at HNZPT. HNZPT staff expressed an interest in including heritage buildings and structures in different communities in the District. HNZPT staff also advised on the importance of identifying significant archaeological site. - Engaged with Museums’ and people with an interest in heritage in the district who assisted with the nomination of buildings and structures; and - Through the Council’s website provided people with an opportunity to nominate buildings or structures for consideration. - Through the draft district plan process the landowners of sites /buildings in SCHED 1 and SCHED 2 were notified. As a result of this feedback one building was removed from the list and another building was added.
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<p><u>Social and Cultural –</u></p> <ul style="list-style-type: none"> Historic heritage provides an insight into our past and provides a context for community identity. Historic heritage also provides valuable information about the past for present and future generations. <p>Costs Anticipated</p> <p><u>Environmental</u></p> <ul style="list-style-type: none"> There is a potential cost if the buildings and structures in SCHED1 are not well maintained and as a result the quality of the environment is adversely affected. This is often referred to as 'demolition by neglect'. This cost has been managed by considering the level of repair as part of the assessment process for buildings/structures and ensuring the provisions do not restrict maintenance. <p><u>Economic</u></p> <ul style="list-style-type: none"> There is the potential lost opportunity cost for landowners of heritage buildings or sites where land could be developed for some more intense use, particularly if it is proposed to demolish or relocate the scheduled buildings. Depending on the zoning some of the incentive rules may assist to offset these costs, along with the permitted activity status for internal alterations. The flexibility provided for internal alterations will mean the internal layout of buildings/structures can be made to suit a range of different permitted activities. There will be consenting costs where applicants wish to undertake activities that do not meet the rules, including permitted standards. This includes the cost of expert heritage advice as well as the consent processing. <p><u>Social and cultural</u></p> <ul style="list-style-type: none"> It is unlikely there will be social and cultural costs from these provisions. <p>Economic growth and employment opportunities</p> <p>Maintaining the identity of places and structures through the retention of buildings and structures with historic heritage values may increase attractiveness of the District to tourists, particularly where the buildings and structures are easily accessible.</p>	
<p>QUANTIFICATION OF BENEFITS & COSTS s32(2)(b)</p>	
<p>Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified. Given the assessment of the scale and significance of the proposed provisions, specific quantification of the benefits and costs in this report is considered neither necessary, beneficial nor practicable in relation to this topic.</p>	
<p>EFFICIENCY & EFFECTIVENESS s32(1)(b)(ii)</p>	<p>REASONS FOR PROVISIONS s32(1)(b)(iii)</p>
<p>Section 32(1)(b)(ii) requires assessing the efficiency and effectiveness of the provisions in achieving the objectives:</p> <p><u>Efficiency</u></p> <p>The proposed provisions have considerably more benefits, and clearly set out the acceptable activities with no or minimal effects as well as those which require closer assessment through the consenting process. The package of provisions will be efficient in achieving the objectives.</p> <p><u>Effectiveness</u></p> <p>The proposed provisions are the most effective in achieving the objective as they directly address the resource management issues and the outcomes sought through the objective. The provisions are consistent with the purpose and principles of the RMA and recognise and provide for Section 6(f). The proposed provisions are considered to be the most effective means of achieving the objective as together they will:</p> <ul style="list-style-type: none"> give effect to the Waikato RPS objectives and policies; and take into account direction in iwi management plans particularly as they relate to accidental discovery protocols; and assist in implementing Strategic Direction SD-O10 in the PDP; and enable the Council to fulfil its statutory obligations, including section 6(f), 7(aa), 7(b), 7(c), 7(f) and 7(g) and is consistent with its functions under section 31 of the RMA; and ensure adverse effects on historic heritage items are managed appropriately by requiring consent for activities that could cause more than minor adverse effects and enabling measures to maintain and promote the reuse of historic heritage; and address the management of activities within the jurisdiction of the Council whilst avoiding unnecessary duplication with HNZPT functions; and enable the Council to effectively administer its District Plan and to monitor the outcomes of the proposed provisions in a clear and consistent manner. 	<p>Section 32(1)(b)(iii) requires a summary of the reasons for deciding on the provisions:</p> <p>The proposed provisions are considered to be the most appropriate approach to achieve the objective of this Chapter. The provisions appropriately give effect to higher order policy documents, including being consistent with the purpose and principles of the RMA. The package of provisions, particularly the accidental discovery protocol, is consistent with the two iwi management plans. (Noting provisions relating to sites and areas of significance to Maori are part of a different chapter). Managing historic heritage is a function of the Council. The social, cultural and environmental benefits of protecting historic heritage, while controlling potential adverse effects will effectively achieve the objective.</p> <p>The recommended policies and rule requirements assessed in this report are the most appropriate to achieve the objectives for the PDP, having considered other reasonably practicable options and having assessed the efficiency and effectiveness of the provisions.</p>