



TAURANGA CITY COUNCIL

CITY PLAN SECTION 32 REPORT

Chapter 7 – Heritage



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1. INTRODUCTION

The Council is required under section 32 of the Resource Management Act 1991 (the RMA) to carry out an evaluation of alternatives, costs and benefits, and efficiency and effectiveness of the various components of the proposed City Plan.

Section 32 of the Act requires that the evaluation must examine:

- (a) the extent to which each objective is the most appropriate way to achieve the purpose of the Act; and
- (b) whether, having regard to their efficiency and effectiveness, the policies, rules or other methods are the most appropriate for achieving the objectives.

An evaluation must also take into account:

- (a) the benefits and costs of policies, rules, or other methods; and
- (b) the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules or other methods.

This report fulfils the obligations of the Council under s32 of the RMA. The following is a section 32 analysis in regard to historic heritage. It should be read together with the text of the proposed City Plan itself.

2. PURPOSE OF THE CHAPTER

Tauranga City Council is required to protect historic heritage from inappropriate subdivision and development and provide for Maori culture and traditions under sections 6(e), (f) and (g) of the Resource Management Act 1991.

In addition people value the historic environment as part of their cultural and natural heritage. It reflects the knowledge, beliefs and traditions of diverse communities. It gives distinctiveness, meaning and quality to the places in which we live, providing a sense of continuity and a source of identity. It is a social and economic asset and a resource for learning and enjoyment.

Heritage is a finite resource – its removal or change is permanent. However, change in the historic environment is inevitable, caused by natural processes, the wear and tear of use, and people's responses to social, economic and technological change.

3. RECORD OF DEVELOPMENT OF PROVISIONS

3.1 Background Research

The following background research has been used to inform the draft heritage provision of the City Plan.

Review of the Operative District Plan

A review of the operative heritage provisions was undertaken to determine their effectiveness and identify opportunities for improvement. The operative objectives, policies and rules for heritage management relate to items contained on the two heritage registers. One register contains buildings, objects and places of both Maori and European significance;

the other contains trees. The extent of the work proposed to the heritage item determines the resource consent requirements and the extent of discretion that is applied.

The bulk of items included on both registers were originally identified as part of the Tauranga District Heritage Management Strategy 1993, which identified and ranked built heritage, archaeological sites, historic sites and historical landscapes, Maori heritage, and notable trees.

A review of the operative objectives, policies and rules has identified the following key issues:

- Objectives and policies need to be updated to align with the regional policy statement.
- Rules for heritage management do not reflect best practice.
- There is no recognition or differentiation between particular heritage qualities of a building, object or site.
- The register is out of date.

Tauranga State of the Environment Report 2004

This is the most recent review of Tauranga's environment and identifies the key environmental issues facing the City. In terms of heritage this report identified that there was generally a negative trend in relation to quantity, quality and accessibility of Tauranga's historic and cultural heritage as these sites come under pressure from growth and urban expansion.

Tauranga City Council Built Heritage Review (Opus Consultants 2009)

This review was an assessment of built heritage that is identified in the operative plan. The purpose of the review was to assess the value of items on the existing built heritage inventory in accordance with the Regional Policy Statement Change No.1 criteria and to identify the significance of each item on a national, regional and local scale. The draft heritage provisions reflect the outcomes of this report.

Central Tauranga Heritage Study (Matthews & Matthews Architects 2007) (www.tauranga.govt.nz)

This study was commissioned as part of the City Centre Strategy and identified built heritage and archaeological sites within the city centre.

In terms of built heritage the study identified two key options to enhance heritage protection:

- Additional buildings to be included on the register (nine buildings were recognised as having particular merit).
- Development of a 'heritage character' overlay (focussed around the Strand and Devonport Road).

The archaeological report identified 59 recorded sites and a potentially significant number of unknown sites within the city centre which are not afforded any additional protection under the District Plan. The report recommends the creation of 'Heritage Alert Zones' to better managed archaeological resources.

Following outcomes of discussions with building owners, the requirements of the Building Act and recommendations from Council officers the Elected Members decided not to pursue these options.

Sustainable Management of Historic Heritage – Guidance Series (New Zealand Historic Places Trust August 2007) (www.historic.org.nz)

This document provides guidelines to assist local government authorities in the sustainable management of heritage including guidance on terminology, scheduling, and objectives, policies and rules. The guidance provided in this document has been considered through the drafting of the heritage provisions.

Historic Places Act 1993

The Historic Places Act 1993 (HPA) primarily focuses on the establishment of a system of registration for historic places, historic areas, waahi tapu and waahi tapu areas; and the control of any works that could adversely affect archaeological, Maori or other relevant values associated with an archaeological site. The HPA also established the New Zealand Historic Places Trust (NZHPT) and the Maori Heritage Council.

The NZHPT participates in heritage management through advocacy and property ownership, and has statutory responsibility for the regulation of archaeological sites. Any person wishing to destroy, damage or modify an archaeological site must obtain an authority from the NZHPT for that work.

The functions of this Act and its relationship to the RMA have been considered through the development of the heritage provisions.

Building Act 2004

The Building Act 2004 requires councils to adopt policies on earthquake prone buildings within their districts. Tauranga City Council adopted its policy on 7 March 2006.

The Earthquake Prone Policy is directed at buildings that were built before 1976 that have 33% or less of the strength of buildings built to current Building Code standards.

Building types (e.g. hospitals, restaurants, apartment buildings etc.) have been prioritised into categories in order of importance; either 'High', 'Moderate', 'Low' or 'Passive'. Maximum timeframes to complete strengthening work is then assigned based on category. The Council is currently in the process of assessing all 'at risk' buildings. The majority of the potential heritage buildings identified in the Tauranga CBD are 'at risk' and need to be upgraded. The tension between the cost of upgrading and the heritage values of these buildings was one of the reasons they were not identified for inclusion in the proposed plan.

International Council on Monuments and Sites (ICOMOS) New Zealand Charter (www.icomos.org.nz)

The ICOMOS New Zealand Charter is a set of guidelines on cultural heritage conservation based general principles and processes associated with conservation. These guidelines have been considered in the drafting of the heritage provisions.

Iwi Management Plans

In accordance with section 74(2A)(a) the Council must take into account any relevant planning document recognised by an iwi authority and lodged with the Council. The following documents are relevant in this regard:

Ngati Ranginui Iwi Vision 20/20
Ngaiternagi Iwi Resource Management Plan 1995

Whilst these two documents cover a range of issues one of the common elements of concern is the loss of sites of significance through urbanisation. Although these documents are dated these issues were still raised as a concern through discussions with the Tangata Whenua Collective.

3.2 Consultation Outcomes

General

In August of 2008 general consultation of issues associated with the heritage chapter and options to address these issues was undertaken. Although the majority of feedback was related to protected trees the following comments were received:

- Compensation for property owners where heritage buildings are protected.
- Provide more incentives and controls to protect built heritage.
- Identify and protect significant sites.

In April of 2009 a community feedback exercise was undertaken on draft content for the City Plan. Again, whilst some general comment was received on the importance of protecting heritage, the majority of submissions were related to the proposed tree register. A total of 57 submissions supported the proposal whilst 39 submissions were in opposition. The comments received are summarised as follows:

General Tree Comment:

- Cost of removal or pruning of trees if removed from register.
- Increased pressure from neighbours to remove trees no longer protected.
- Requests for removing street trees.

Support

- Cost of maintaining a registered tree – physical damage, neighbour relationships
- Ability to manage trees without resource consents.

Oppose

- Trees should be retained for the amenity of the city
- Want threshold for inclusion raised higher so their tree could be removed.
- Loss of maintenance assistance from the Council.

Tangata Whenua

In June and July 2008 specific hui were held with tangata whenua to identify issues for consideration in the drafting of the City Plan. The following relevant issues were identified:

- How to recognise urupa etc, sufficient protection?
- Currently list; need guidance from Tangata Whenua
- As pressure comes on rural area especially concern with protection
- How to “measure” significance of the site?
- Buffer zone around significant sites – potential for this?
- Is District Plan going to take account of Iwi/Hapu Protocols. Council Staff advised that they are a guide that flag issues, would be appropriate to go back to iwi/hapu
- How does this match the Regional Council’s heritage sites?
- How assessed – buildings in CBD – used Regional Councils heritage criteria

- Heritage sites in the plan as schedule and on maps identified by a symbol.
- Regional Statement – can get from EBOP
- How iwi involved in identifying sites. Raised by Councils Tangata Whenua Collective at Regional Policy level that more involvement wanted.
- Buffer from wahi tapu? Where does it begin and end?
- Process to identify sites/areas – iwi/hapu management plans and protocols etc
- Development of maori land – want to ensure wahi tapu site is protected.
- Is it working effectively today?
- Issue of archaeologist report assessing the extent etc
- Identification of sites
- How far do we take into regard areas as staff (dot on map)
- Looking for good process.
- In the past often didn't want to identify site but needs to be identified to protect it i.e. process to ensure tangata whenua have input to indicate extent etc
- In the past it has been ad hoc, need good communication between departments/authorities etc.
- How do we improve methods/workings and understand process when issue arises
- Sensitive/sentimental attachment especially to wahi tapu, buffer often a much wider space than identified site – tangata whenua need to identify.
- Building Inventory in Cultural Strategy; need to get this right – issue of remedying different mindsets about what is important – mismatch between world views
- Need to be using same language, so that there is a common system in terminology
- Integrated system of wahi tapu identification /protection

Tangata Whenua Collective

In addition to these specific hui staff regularly attended meetings of the Tangata Whenua Collective to provide updates and seek feedback and guidance on development of the draft plan content. On 11 December 2008 a specific workshop was also held with the Collective to discuss how the plan can provide for the future management of sites of significance. The Collective have been kept informed through the development of the proposed provisions.

Key Stakeholders – Built Heritage and Protected Trees

Following the identification of additional buildings of heritage value through the Central Tauranga Heritage Study, letters were sent to those property owners to initiate discussion on their inclusion in the draft plan. As a result of the feedback received Elected Members resolved to not identify any additional heritage buildings.

In August 2008 targeted consultation was undertaken with property owners currently affected by the operative tree register to provide them with an opportunity to comment on the future of tree protection as part of the review. The following comments were received:

- Review the existing tree register and relevant rules.
- Large number of requests for removal of specific registered trees (94 submissions).
- Trees should only be protected on public property only.
- Support of the existing register and the value of protecting trees on a register.
- Trees should not be protected where they cause nuisance, become too large in residential environment or present a health and safety issue.
- Protect native trees only.

- Incentives to protect trees.
- Remove trees that do not meet existing policy threshold criteria for inclusion on the register.
- Costs of removing de-registered trees – who is responsible?

3.3 Council Meetings

Strategy and Policy Committee Meeting 23 June 2008

Issues discussed:

- The protection of heritage buildings.
- The protection of trees
- Site of significance to Maori.
- Protection for registered archaeological sites

Meeting outcomes:

- Consider amendments to the existing register (existing and additional buildings) and investigate providing more comprehensive incentives and/or controls to manage built heritage.
- Review existing tree register to consider amending number of trees listed, tree classifications and location descriptions and provide a summary of the proposed method of approach to property owners (and adjacent property owners) affected by the review of the tree register
- Undertake a review of the register by reviewing items on the existing register and reviewing available documentation including Iwi/Hapu protocol, Iwi/Hapu Management Plans and SmartGrowth research documents.
- Investigate providing more comprehensive methods for protection / consideration of archaeological sites where potentially affected by development, including aligning with Historic Places Trust methodologies.

Strategy and Policy Committee Meeting 17 November 2008

Issues discussed:

- Should the format of the Heritage register be changed?
- Should additional buildings be included on the register?
- Identifying conservation area overlays
- How should built heritage be managed
- Recognition of historic reserves.
- How should trees be registered?
- Should geographic location of protected trees be recognised in assessing their value?
- How should the value of trees be assessed?
- Where should STEM score thresholds be set for notable trees
- Should additional significant Tangata Whenua sites be included on the register
- Integration of the tangata whenua consultation policy (TWCP).
- Should additional archaeological sites be included on the register?

Meeting outcomes:

- Introduce categories for buildings, sites and objects to recognise significance.
- Update register and consider including some or all nine buildings identified in the Tauranga Heritage study.

- Do not introduce conservation overlays
- Develop mix of sympathetic and restrictive rules including incentives.
- Investigate recognising historic reserves through the District Plan in a staged manner.
- Maintenance cost to Council – what Council is permitted to do through district plan. Classify and register trees as ‘heritage’ and ‘notable’ (‘landscape’ classification would be removed).
- Do not recognise value of geographic location in tree assessments.
- Assess trees for inclusion based on STEM score, RPS criteria and a ‘site suitability’ criteria (to be developed).
- Minimum STEM score threshold between 150 – 170 (to be determined).
- Review and identify significant sites through discussions with tangata whenua and cultural advisor.
- Do not integrate the TWCP with the plan.
- In consultation with land owner. Recognise significant sites only in consultation with HPT.

Strategy and Policy Committee Meeting 13 March 2009

The purpose of this meeting was to discuss of key issues following completion of the first cut of draft plan content prepared for informal submissions.

Issues discussed:

- Owners of the nine buildings identified as significant heritage buildings had been consulted and indicated they were not interested in having the heritage quality of these buildings formally recognised at this stage. It was therefore recommended that these buildings not be included in the Heritage Register.
- It was not considered necessary to recognise historic reserves through the District Plan, as this was appropriately managed through the Reserves Act.
- The minimum STEM score of registered trees had been set at 150, reducing the number of registered trees from over 1200 to 173. Property owners of trees to be retained would be advised in writing and would have the opportunity to submit on this matter. Most registered trees were on private property.
- Tangata Whenua were still in the process of reviewing significant Maori sites.
- The process of recognising significant archaeological sites was continuing and was predicted to remain at status quo (approximately 10 sites).

Meeting outcomes:

- Notify draft plan content for informal submissions.

Strategy and Policy Committee Meeting 5 August 2009

Issues discussed:

- Built Heritage – Future Management of The Elms site
- Trees – Oppose Proposed Tree Register
- Trees – Support Proposed Tree Register

Meeting outcomes:

- Include an Elms Outline Development Plan to enable future
- Introduce another STEM threshold for native trees only (suggest 130 STEM points).
- Retain proposed STEM threshold (150 STEM points).

3.4 Relevant Legislation, Strategies and Policy

The following legislation, strategies and policies have been considered through the development of the heritage provisions.

3.4.1 Legislation

Resource Management Act 1991 (the RMA)

The sections of the RMA considered relevant to earthworks are identified as follows:

Section 5 – Purpose of the Act

- (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –*
 - (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
 - (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
 - (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

The introduction of specific heritage provisions is considered to be consistent with the purpose of the Act.

Section 6 – Matters of National Importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

...

- (e) The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.*
- (f) [the protection of historic heritage from inappropriate subdivision, use, and development.]*

...

Section 7 – Other Matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to:

- (c) the maintenance and enhancement of amenity values*
- (f) maintenance and enhancement of the quality of the environment*

3.4.2 Policy

Territorial authorities are required to give effect to policy statements under section 75(3) of the RMA. The provisions of the Regional Policy Statement relevant to subdivision are identified below.

Bay of Plenty Regional Policy Statement (www.envbop.govt.nz)

Environment Bay of Plenty's Plan Change No. 1 became operative on 26 June 2008 and incorporated a number of issues, objectives, policies and methods for historic heritage and Maori culture and traditions into the Regional Policy Statement. Change Number 1 requires District Councils to assess historic heritage in the region by using criteria not inconsistent with those in Appendix F Set 1: Natural Character – in the Appendices Section of Change 1. As a result of the RMA Amendment Act Councils must 'give effect to' the Regional Policy Statement and any amendments such as Change 1.

Chapter 5 - Maori Culture and Traditions

5.3.2(a) Objective

Recognition of an provision for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.

5.3.2(b) Policies

5.3.2(b)(i) To recognise and provide for traditional Maori uses and practices relating to natural and physical resources such as mahinga maataitai, waahi tapu and taonga raranga, where appropriate.

5.3.2(b)(iii) To recognise the particular sensitivity of Maori heritage and the inappropriateness of expressly identifying some sites of value to tangata whenua.

5.3.2(b)(iv) To recognise that only Maori can identify their relationship and that of their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga.

5.3.2(b)(v) To assess the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga, in relation to section 6(e) of the Act, by the extent to which criteria not inconsistent with those in Appendix F set 4: Maori Culture and Traditions are met.

5.3.2(b)(vi) To use criteria not inconsistent with those in set 4 of Appendix F when preparing provisions relating to the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga, in relation to section 6(e) of the Act, for inclusion in regional and district plans for the purpose of Part V of the Act.

The methods of implementing these policies are identified as:

5.3.2(c) Methods of Implementation

Environment Bay of Plenty, City and District Councils are encouraged to:

5.3.2(c)(i) Include in plans, through consultation with iwi and hapu, policies and methods to protect the mauri of resources.

5.3.2(c)(ii) Provide, in plans and resource management decisions, for the protection of areas or sites of traditional value or of other significance to tangata whenua.

5.3.2(c)(iii) *Develop appropriate provisions, in consultation with iwi and hapu, for managing and protecting the relationship of Maori with sites or places which are of special significance to tangata whenua.*

5.3.2(c)(iv) *Provide for identified Maori traditional and cultural relationships with their ancestral sites and areas when considering the impact of a proposed activity.*

The relevant assessment criteria identified in Appendix F are listed below:

Set 4 Maori Culture and Traditions²¹

Mauri

4.1 *Ko te mauri me te mana o te waahi, te taonga ranei, e ngakaunuitia ana e te Maori; The mauri (for example life force and life supporting capacity) and mana (for example integrity) of the place or resource holds special significance to Maori;*

Waahi Tapu

4.2 *Ko tera waahi, taonga ranei he waahi tapu, ara, he tino whakahirahira ki nga tikanga, ki nga puri mahara, me nga wairua a te Maori;*

The place or resource is a waahi tapu of special, cultural, historic and or spiritual importance to Maori;

Korero Tuturu/Historical

4.3 *Ko tera waahi e ngakaunuitia ana e te Maori ki roto i ona korero tuturu;*

The place has special historical and cultural significance to Maori;

Rawa Tuturu/Customary Resources

4.4 *He waahi tera e kawea ai nga rawa tuturu a te Maori;*

The place provides important customary resources for Maori;

Hiahiatanga Tuturu/Customary Needs

4.5 *He waahi tera e eke ai nga hiahia hinengaro tuturu a te Maori;*

The place or resource is a venue or repository for Maori cultural and spiritual values;

Whakaaronui o te Wa/Contemporary Esteem

4.6 *He waahi rongonui tera ki nga Maori, ara, he whakaahuru, he whakawaihanga, me te tuku matauranga;*

The place has special amenity, architectural or educational significance to Maori.

Chapter 15 – Natural Features and Landscapes and Historic Heritage

15.3.1(a) Objective

The protection of historic heritage and outstanding natural features and landscapes from inappropriate subdivision, use and development.

15.3.1(b) Policies

15.3.1(b)(i) *To recognise historic heritage and outstanding natural features and landscapes.*

15.3.1(b)(ii) *To recognise and provide for the interrelationships between historic heritage and outstanding natural features and landscapes and other regional resources.*

15.3.1(b)(iii) *To ensure an integrated inter-agency approach to the protection of historic heritage and outstanding natural features and landscapes from inappropriate subdivision, use, and development.*

15.3.1(b)(iv) *To afford priority to the protection of historic heritage and natural features and landscapes assessed as warranting protection under section 6 of the Act.*

15.3.1(b)(vi) *To assess the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga, in relation to section 6(e) of the*

Act, by the extent to which criteria not inconsistent with those in Appendix F set 4: Maori Culture and Traditions are met.

15.3.1(b)(vii) To assess historic heritage, in relation to section 6(f) of the Act, by the extent to which criteria not inconsistent with those in Appendix F set 5: Historic Heritage are met.

15.3.1(b)(viii) To assess, using criteria not inconsistent with those in Appendix G, whether subdivision, use and development is inappropriate in regard to historic heritage and natural features and landscapes considered to warrant protection under section 6 of the Act.

15.3.1(b)(ix) To use criteria not inconsistent with those in Appendix F when preparing provisions relating to historic heritage and outstanding natural features and landscapes for inclusion in regional and district plans for the purpose of Part V of the Act.

The methods of implementing these policies are identified as:

15.3.1(c) Methods of Implementation

Environment Bay of Plenty, City and District Councils, in co-operation with relevant agencies, will:

15.3.1(c)(ii) Assess historic heritage using criteria not inconsistent with those in Appendix F set 5: Historic Heritage.

Set 5 Historic Heritage

Policies 15.3.1(b)(vii), 15.3.1(b)(ix)

Methods 15.3.1(c)(ii), 15.3.1(c)(xiv)

Generic Values (criteria to be applied in all assessments of historic heritage):

Period

5.1 The development sequence of a place or area, the likely age, duration of use or chronology of a place or area;

Rarity or Special Features

5.2 The unique, uncommon or rare features of a place or area. This may be as a result of the cultural context of the place or area. This may include the technical interest of all or any part of the place or area. The previous existence and nature of lost or obliterated components or aspects. The function of the place and its parts and the relationship of the place and its parts with its setting;

Integrity

5.3 The condition, quality and state of original features of a place or area. Comparison with other examples of its class. The quality of any restoration, addition or modification of the place or area;

Representativeness

5.4 The characteristics and relationship of the place or area to other places or areas in its class, for example in respect of design, type, features, technology, use, activity, location or origin;

Context or Group Value

5.5 Association with other places, areas or elements of its context. Association with and illustration of broad patterns of history. Places or areas in which evidence of the association or event survives in situ, or in which the settings are substantially intact;

Diversity (Form and Features)

5.6 The characteristics, diversity and pattern of a place or area. The cultural influences which have affected the form and components of the place or area. Form, scale, colour, texture and materials. The historical content of the place or area with particular reference to the ways in which it has been influenced by historical forces or has itself influenced the course of history;

Fragility or Vulnerability

5.7 The components, form and structure of the place or area and the effect of this on its survival. Its vulnerability to deterioration or destruction. The degree to which it is threatened and its context in terms of protection and services;

In addition to the above generic values, any assessment of historic heritage qualities must consider the following:

*Archaeological Qualities
Information*

5.8 The potential of the place or area to define or expand knowledge of earlier human occupation, activities or events through investigation using archaeological methods;

Research

5.9 The potential of the place or area to provide evidence to address archaeological research questions;

Recognition or Protection

5.10 The place or area is registered by the New Zealand Historic Places Trust for its archaeological values, or is recorded by the New Zealand Archaeological Association Site Recording Scheme, or is an 'archaeological site' as defined by the Historic Places Act 1993;

*Architectural Qualities
Style or Type*

5.11 The style of the building or structure is representative of a significant development period in the region or the nation. The building or structure is associated with a significant activity (for example institutional, industrial, commercial or transportation);

Design

5.12 The building or structure has distinctive or special attributes of an aesthetic or functional nature. These may include massing, proportion, materials, detail, fenestration, ornamentation, artwork, functional layout, landmark status or symbolic value;

Construction

5.13 The building or structure uses unique or uncommon building materials, or demonstrates an innovative method of construction, or is an early example of the use of a particular building technique;

Designer or Builder

5.14 The building or structure's architect, designer, engineer or builder was a notable practitioner or made a significant contribution to the region or nation;

Cultural Qualities

Sentiment

5.15 The place or area is important as a focus of spiritual, political, national or other cultural sentiment;

Identity

5.16 The place or area is a context for community identity or sense of place, and provides evidence of cultural or historical continuity;

Amenity or Education

5.17 The place or area has symbolic or commemorative significance to people who use or have used it, or to the descendants of such people. The interpretative capacity of the place or area and its potential to increase understanding of past lifestyles or events;

Historic Qualities

Associative Value

5.18 The place or area has a direct association with, or relationship to, a person, group, institution, event or activity that is of historical significance to Bay of Plenty or the nation;

Historical Pattern

5.19 *The place or area is associated with broad patterns of local or national history, including development and settlement patterns, early or important transportation routes, social or economic trends and activities;*

*Scientific Qualities
Information*

5.20 *The potential for the place or area to contribute information about an historic figure, event, phase or activity;*

Potential – Scientific Research

5.21 *The degree to which the place or area may contribute further information and the importance of the data involved, its rarity, quality or representativeness;*

Technological Qualities

Technical Achievement

5.22 *The place or area shows a high degree of creative or technical achievement at a particular time or is associated with scientific or technical innovations or achievements.*

Appendix G

CRITERIA FOR ASSESSING WHETHER SUBDIVISION, USE AND DEVELOPMENT IS INAPPROPRIATE

Policies 15.3.1(b)(viii), 16.3.1(b)(xi) Method 15.3.1(c)(xiii)

- 1 Character and degree of modification, damage, loss or destruction;*
- 2 Duration and frequency of effect (for example long-term or recurring effects);*
- 3 Magnitude or scale of effect (for example number of sites affected, spatial distribution, landscape context);*
- 4 Irreversibility of effect (for example loss of unique or rare features, limited opportunity for remediation, the costs and technical feasibility of remediation or mitigation);*
- 5 Resilience of heritage value or place to change (for example ability of feature to assimilate change, vulnerability of feature to external effects);*
- 6 Opportunities to remedy or mitigate pre-existing or potential adverse effects (for example restoration, enhancement), where avoidance is not practicable;*
- 7 Probability of effect (for example likelihood of unforeseen effects, ability to take precautionary approach);*
- 8 Cumulative effects (for example loss of multiple locally significant features).*

3.4.3 Strategy

Smartgrowth (www.smartgrowthbop.org.nz)

As the regional growth management strategy Smartgrowth recognises that heritage is under threat from growth and development and that there is a general lack of awareness and understanding of heritage values (see section 7.1.10 Cultural Heritage)

Some of the key principles recognise the need to protect outstanding or significant heritage features as a matter of priority and encourages protection of unique or representative places. Action 2 identifies the importance of the District Plan in protecting outstanding and significant sites.

Tauranga Tomorrow (www.tauranga.govt.nz)

Tauranga Tomorrow identifies the community outcomes for Tauranga. The associated heritage related actions include:

- Action B14 – Establish a system of incentives to save Tauranga's remaining heritage buildings and features.
- Action B18 – Celebrate Tauranga's heritage, resources and history.
- Action B20 – Continue to map character areas, heritage and historical features.
- Action B31 – Creating a cultural heart in the CBD.

City Centre Strategy (www.tauranga.govt.nz)

This strategy identifies heritage retention as a key component in cementing the civic role of the city centre and providing for the cultural well being of the community. This is reflected in the following actions:

- Action TB4 – Implement and promote the findings of the Heritage Overview study;
- Action TG7 – Prepare design requirements for the development of sites identified in the Heritage Overview study.
- Action TG8 – Develop design guidelines for new development adjacent to identified heritage buildings, as part of the Council's heritage work.

Urban Design Strategy (Tauranga City Council 2006) (www.tauranga.govt.nz)

This strategy outlines the Council's commitment to urban design through a series of principles. *Principle 2 – Protect and reflect the local identity* recognises that features and buildings of importance to the community should be recognised and protected through the district plan review.

Vegetation Management Strategy 2006 (www.tauranga.govt.nz)

The Vegetation Strategy sets a co-ordinated vision for vegetation protection across Tauranga. This strategy has several actions which are relevant to the District Plan review which generally require a review of the existing tree register and protected tree stock including the associated rules that govern these trees.

3.4.4 Recognised Iwi Documents

Iwi / Hapu Protocols and Management Plans

Twelve iwi and hapu have agreed protocols with Tauranga City Council. These protocols recognise the importance of involving tangata whenua in the decision making process where those decisions potentially affect involve matters that are important to Maori. The protocols also identify sites of significance to the relevant tribes. The management plans, like the protocols, identify the aspirations and significant sites to the relevant iwi / hapu

The RMA requires that these documents be taken into account in preparing a district plan.

4. ISSUES

3.5 Summary of Issues

The importance of historic heritage is clearly identified in the RMA and Regional Policy Statement Plan Change No.1 provides clear direction on how territorial authorities should manage their heritage stock.

Heritage is a finite resource – its removal or change is permanent and yet change in the historic environment is inevitable, caused principally by the pressures of growth but also by

natural processes, the wear and tear of use, and people's responses to social, economic and technological change. The key issue for the City's historic heritage resource is how these values will be conserved in the face of such change and pressure.

3.6 Issue 1: The pressures associated with growth and urban expansion can destroy, damage or devalue Tauranga's historic and cultural heritage.

3.6.1 Issue Statement

The protection of historic heritage from inappropriate subdivision, use and development is identified as a matter of national importance under the RMA. The operative plan provisions have essentially remained unchanged since their inception through the initial drafting of the operative plan. In addition the operative provisions relate to heritage registers which themselves are based on a survey undertaken in 1993. A review of the operative provisions has identified that the objectives, policies and rules for heritage management are inadequate in terms of balancing development pressure against the need to maintain heritage values where these exist; and in terms of being out of date with the statutory requirements of the RMA and the regional policy statement.

3.6.2 Objectives

This table identifies the appropriateness of the listed objectives in achieving the purpose of the RMA.

Objective Number	Objective	Appropriateness
7.1.1.1	<p><i>Objective – Historic Heritage</i></p> <p><i>The factors, values and associations that define the City's historic heritage are identified and protected</i></p>	<p>This objective is:</p> <ul style="list-style-type: none"> • Relevant to providing an overarching framework for the sustainable management of historic heritage values for the social, economic and cultural well being of the community; and giving effect to the regional policy statement. • Useful as it provides flexibility between managing heritage identified in the plan whilst providing future opportunity for as yet unidentified historic heritage to be specially recognised in the plan. • Achievable through the supporting policies and rules. • Reasonable as it relates to the statutory requirements under section 6(e) and (f) of the RMA.
7.2.1.1	<p><i>Objective Built Heritage</i></p> <p><i>The factors, values and associations that define the City's built heritage are identified and protected.</i></p>	<p>This objective is:</p> <ul style="list-style-type: none"> • Relevant to providing a framework for the sustainable management of built heritage values for the social, economic and cultural well being of the

		<p>community; and giving effect to the regional policy statement.</p> <ul style="list-style-type: none"> • Useful as it outlines the expectations specifically related to the management of built heritage values where they may be adversely affected by inappropriate subdivision, use and development. • Achievable through the supporting policies and rules for built heritage. • Reasonable as it relates to the statutory requirements under section 6(f) of the RMA.
7.3.1.1	<p><i>Objective – Significant Maori Areas</i></p> <p><i>The factors, values and associations that define the City's significant Maori areas are identified and protected.</i></p>	<p>This objective is:</p> <ul style="list-style-type: none"> • Relevant to providing a framework for the sustainable management of cultural heritage values for the social, economic and cultural well being of the community; and giving effect to the regional policy statement. • Useful as it identifies the expectations specifically related to managing the potential adverse effects of inappropriate subdivision, use and development on sites of significant to Maori. • Achievable through the proposed supporting policies and rules for significant Maori areas. • Reasonable as it relates to the statutory requirements under section 6(e) and (f) of the RMA.
7.3.1.2	<p><i>Objective – Other Areas of Importance to Maori</i></p> <p><i>The relationships of Tangata Whenua with other sites of spiritual, cultural or historical significance are recognised and provided for.</i></p>	<p>This objective is:</p> <ul style="list-style-type: none"> • Relevant in acknowledging that in the interests of cultural sensitivity and the well being of the community it is not always appropriate to identified areas of significance to Maori. • Useful as provides the opportunity to consider the relationship of Maori with sites of cultural significance not specifically identified in the plan. • Achievable through the proposed supporting policies

		<p>and rules of the plan.</p> <ul style="list-style-type: none"> • Reasonable as it relates to the statutory requirements under section 6(e) of the RMA.
7.4.1.1	<p><i>Objective – Significant Archaeological Sites</i></p> <p><i>The factors, values and associations that define the City’s significant archaeological sites are identified and protected</i></p>	<p>This objective is:</p> <ul style="list-style-type: none"> • Relevant to providing a framework for the sustainable management of significant archaeological sites for the social, economic and cultural well being of the community; and giving effect to the regional policy statement. • Useful as it identifies the expectations for specifically managing the potential adverse effects of inappropriate subdivision, use and development on significant archaeological sites that are identified in the plan. • Achievable through the supporting policies and rules. • Reasonable as it relates to the statutory requirements under section 6(f) of the RMA and having regard to the requirements of the Historic Place Act 1993.
7.4.1.2	<p><i>Objective – Other Archaeological Sites</i></p> <p><i>The opportunity to manage other archaeological sites through subdivision, use and development is recognised.</i></p>	<p>This objective is:</p> <ul style="list-style-type: none"> • Relevant in providing for the social and cultural well being of people and the community. • Useful as it provides for a ‘dovetailing’ between the RMA and the Historic Places Act to enable the consideration of unidentified sites through the subdivision, use and development of land. • Achievable through the supporting policies and rules. • Reasonable as it relates to the statutory requirements under section 6(f) of the RMA.
7.4.1.1	<p><i>Objective – Heritage Trees</i></p> <p><i>The factors, values and associations that define the City’s heritage trees are identified and protected</i></p>	<p>This objective is:</p>

3.6.3 Policies, Methods, Alternatives and EREs

The objectives identified in the previous section are interrelated and together provide a package for managing the City’s historic heritage in accordance with the statutory requirements of the RMA and through giving effect to the regional policy statement.

The approach taken to managing historic heritage through the proposed City Plan is as follows:

- (a) Overarching provisions for general management of the City’s historic heritage
 - Objective 7.1.1.1 is addressed through Policies 7.1.1.1.1, 7.1.1.1.2 and 7.1.1.1.3.
- (b) Specific built heritage provisions.
 - Objective 7.2.1.1.1 is addressed through Policies 7.2.1.1.1, 7.2.1.1.2, 7.2.1.1.3, 7.2.1.1.4 and 7.2.1.1.5.
- (c) Specific Maori heritage provisions.
 - Objectives 7.3.1.1 and 7.3.1.2 are addressed through Policies 7.3.1.1.1, 7.3.1.1.2, 7.3.1.1.3, 7.3.1.1.4 and 7.3.1.2.1.
- (d) Specific archaeological site provisions
 - Objectives 7.4.1.1 and 7.4.1.2 are addressed through Policies 7.4.1.1.1, 7.4.1.1.2 and 7.4.1.2.1
- (e) Specific heritage tree provisions.
 - Objective 7.5.1.1 is addressed through Policies 7.5.1.1.1, 7.5.1.1.2 and 7.5.1.1.3

The policies and methods relevant to the management of these items are identified below.

General Provisions

Policies and Methods	<p><i>Policy 7.1.1.1.1 – Identification of Historic Heritage</i></p> <p><i>Policy 7.1.1.1.2 – Protection of Historic Heritage</i></p> <p><i>Policy 7.1.1.1.3 – Removal or Amendment of an Item on the Register of Protected Features</i></p> <p><i>These policies will be achieved through:</i></p> <ul style="list-style-type: none"> • <i>Providing criteria against which historic heritage will be assessed where it is to be specifically identified in the plan.</i> • <i>Consideration of discretionary and non-complying activities under Rule 7.9 and 7.10.</i> • <i>Enabling updates to the plan to occur subject to the criteria outlined in the policy.</i>
Costs	<p><i>Historic heritage being put at risk through requiring it to be formally assessed and the time associated with statutory processes if that item is to be included in the plan.</i></p>
Benefits	<ul style="list-style-type: none"> • <i>Clear criteria for assessing the value of historic heritage where it is identified,</i> • <i>Enhanced protection for the range of the City’s historic heritage by identifying a set of criteria against which the potential adverse effects of subdivision, use and development will be considered.</i> • <i>Certainty of process for making minor amendments registered heritage items in the interests of avoiding undue formality.</i>

Risk	<i>Not providing criteria against which the values of historic heritage will be assessed would be inconsistent with regional policy statement direction and the statutory requirements of the RMA.</i>
Efficiency	<p><i>The policies and methods are efficient because:</i></p> <ul style="list-style-type: none"> <i>• They provide a clear policy framework against which the value of historic heritage can be assessed,</i> <i>• They enable the potential adverse effects of subdivision, use and development can be assessed and</i> <i>• They identify the scope within which minor amendments can be made to heritage registers.</i>
Effectiveness	<i>The policies and methods are effective because they identify criteria for identifying and protecting historic heritage which enable the objective to be achieved.</i>
Appropriateness	<i>The policies and methods for managing the City's historic heritage are appropriate to achieve the objective, to give effect to the regional policy statement and to meet the Council's statutory requirements under section 6 of the RMA.</i>

Built Heritage

Policies and	<p><i>Policy 7.2.1.1.1 – Protecting Built Heritage</i></p> <p><i>Policy 7.2.1.1.2 – Relocation of Category A and B Built Heritage</i></p> <p><i>Policy 7.2.1.1.3 – Demolition of Category A and B Heritage Items</i></p> <p><i>Policy 7.2.1.1.4 – Relocation of Category C Built Heritage</i></p> <p><i>Policy 7.2.1.1.5 – Demolitions of Category C Heritage Items</i></p>
Methods	<p><i>A register of built heritage</i></p> <p><i>Identifies built heritage within the City and its value for the purpose of the City Plan and any Historic Places Trust value.</i></p> <p><i>Rules 7.7.1 and 7.7.2 – Permitted Activity Rules.</i></p> <p><i>These rules identify the extent of maintenance and repair that is permitted on an identified built heritage item.</i></p> <p><i>Rule 7.8 – Restricted Discretionary Activity Rules.</i></p> <p><i>These rules enabling the potential adverse effects of repairs, use and development within a built heritage site and additions and alterations to Category C buildings to be considered against the relevant policies.</i></p> <p><i>Rule 7.9 – Discretionary Activity Rules and Rule 7.10 – Non-Complying Rules</i></p> <p><i>These rules providing a more robust assessment of potential adverse effects where heritage buildings, in particular Category A</i></p>

	<i>and B, are proposed to be altered, relocated or demolished.</i>
Costs	<i>Potential additional regulatory costs to land owners and developers through introducing a revised and more structured method of managing the City's built heritage resource</i>
Benefits	<i>Clearly identifying the City's built heritage and its value provides the opportunity to introduce a revised and enhanced approach to managing the values of this heritage.</i>
Risk	<ul style="list-style-type: none"> • <i>The proposed built heritage policies and methods provide more certainty as to what type of activities are appropriate which will reduce the risk of built heritage and its values being adversely affected.</i> • <i>The proposed regulatory framework around managing built heritage could deter building owners from maintaining their buildings resulting in the loss of the City's heritage values. Given the limited number of heritage buildings it is considered the risk of this is low.</i> <p><i>Overall it is considered the risk to the city's built heritage from the proposed policies and methods is low.</i></p>
Efficiency	<i>The built heritage register identifies specific heritage items the value of those items and the associated policies and rules clearly signal to the community how the potential adverse effects of subdivision, use and development on built heritage values will be considered. This is an efficient approach in achieving the objective.</i>
Effectiveness	<i>Introducing categories for built heritage identifies the value of specific buildings and enables a regulatory framework to be applied to effectively manage the potential adverse effects from subdivision, use and development on these values in accordance with the objective.</i>
Appropriateness	<i>The policies and methods for managing the City's built heritage are appropriate to achieve the objective, to give effect to the regional policy statement and to meet the Council's statutory requirements under section 6 of the RMA.</i>

Maori Heritage

Policies	<p><i>Policy 7.3.1.1.1 – Identification of Significant Maori Areas</i></p> <p><i>Policy 7.3.1.1.2 – Protecting Significant Maori Areas</i></p> <p><i>Policy 7.3.1.1.3 – Recognising the Modification of Significant Maori Areas</i></p> <p><i>Policy 7.3.1.1.4 – Consultation</i></p> <p><i>Policy 7.3.1.2.1 – Subdivision, Use and Development</i></p>
Methods	<p><i>A register of significant Maori areas</i></p> <ul style="list-style-type: none"> • <i>Identifies significant Maori areas and the values of those areas. Each site is also assigned a category depending on their state of</i>

	<p><i>'intactness.</i></p> <ul style="list-style-type: none"> <i>• The plan maps identify the location and extent of these areas.</i> <p><i>Rule 4.3.2 – Permitted Activity Rules (Earthworks) and Rule 4.3.3 – Restricted Discretionary Activity Rules (Earthworks)</i></p> <p><i>These rules identify the volumes of earthworks that are provided for within significant Maori areas and the matters that Council will consider when these thresholds are not complied with.</i></p>
Costs	<p><i>Introducing a revised and more enhanced method of managing the City's significant Maori sites has resulted in an increase in the number of sites identified. This has potential additional regulatory costs to land owners and developers where earthworks thresholds cannot be met.</i></p>
Benefits	<ul style="list-style-type: none"> <i>• Clearly identifying the location and extent of the City's significant Maori areas provides the opportunity for a targeted approach to managing the values of these areas where they are at risk from inappropriate subdivision, use and development.</i> <i>• Encourages meaningful consultation with tangata whenua at the start of the development process and provides the opportunity for them to have input into how subdivision, use and development may adversely affect a particular area.</i>
Risk	<ul style="list-style-type: none"> <i>• Identifying significant Maori areas reduces the risk of these areas being adversely affected through subdivision, use and development.</i> <i>• Not identifying significant Maori areas would result in them being at risk from inappropriate subdivision, use and development which could adversely affect cultural relationships with these areas.</i> <p><i>Overall the risk of adversely effecting sites of significance to Maori from inappropriate subdivision, use and development is considered to be low</i></p>
Efficiency	<p><i>The register of significant Maori areas identifies the value these areas and the associated policies and rules clearly signal to the community how the potential adverse effects of subdivision, use and development within these areas will be considered. This is an efficient approach in achieving the objectives.</i></p>
Effectiveness	<p><i>Including a list of significant Maori areas which recognises their values and intactness enables a regulatory framework to be applied to effectively manage the potential adverse effects of subdivision, use and development on these areas in accordance with the objectives.</i></p>
Appropriateness	<p><i>The policies and methods for managing the City's built heritage are appropriate to achieve the objective, to give effect to the regional policy statement and to meet the Council's statutory requirements under section 6(e) and (f) of the RMA.</i></p>

Archaeological Sites

Policies	<i>Policy 7.4.1.1.1 – Identifying Significant Archaeological Sites</i>
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	<p><i>Policy 7.4.1.1.2 – Protecting Significant Archaeological Sits</i></p> <p><i>Policy 7.4.1.2.1 – Other Archaeological Sites</i></p>
Methods	<p><i>A register of significant archaeological sites</i></p> <ul style="list-style-type: none"> • <i>Identifies the city's significant archaeological sites.</i> • <i>The plan maps identify the extent of these sites.</i> <p><i>Rule 4.3.2 – Permitted Activity Rules (Earthworks) and Rule 4.3.3 – Restricted Discretionary Activity Rules (Earthworks)</i></p> <p><i>These rules identify the volumes of earthworks that are provided for within significant archaeological sites and the matters that Council will consider when these thresholds are not complied with.</i></p>
Costs	<p><i>Introducing a revised and more specific method of managing the City's significant archaeological sites has potential additional regulatory costs to land owners and developers where earthworks thresholds cannot be met.</i></p>
Benefits	<ul style="list-style-type: none"> • <i>Clearly identifying the location and extent of the City's significant archaeological sites provides the opportunity for a targeted approach to managing the values of these areas.</i> • <i>Ensures that subdivision, use and development of identified archaeological sites can be appropriately managed and provides for the consideration of other sites not specially identified in the plan.</i>
Risk	<p><i>The register of archaeological sites identifies the city's key sites only and the policies and methods provide for sites whether identified or not, to be considered through the subdivision, use and development of land. The policies and methods are intended to compliment the provisions of the Historic Places Act 1993 and therefore it is considered that the risk to those sites not identified in the plan is low.</i></p>
Efficiency	<p><i>The register identifies the city's significant archaeological sites in conjunction with the proposed policies and methods represent a two tired approach to managing archaeological sites in providing for their protection from inappropriate subdivision, use and development whilst complimenting the provisions of the Historic Places Act 1993. This is an efficient approach in achieving the objectives.</i></p>
Effectiveness	<p><i>The proposed policies and methods are effective because they provide a clear statutory framework which enables the Council to consider the potential adverse effects of inappropriate subdivision, use and development.</i></p>
Appropriateness	<p><i>The policies and methods for managing the City's significant archaeological site are appropriate to achieve the objectives, to give effect to the regional policy statement and to meet the Council's statutory requirements under section 6(f) of the RMA.</i></p>

Heritage Trees

Policies	<p><i>Policy 7.5.1.1.1 – Identification of Heritage Trees</i></p> <p><i>Policy 7.5.1.1.2 – Protecting Heritage Trees</i></p> <p><i>Policy 7.5.1.1.3 – Removal of a Heritage Tree</i></p>
Methods	<p><i>A register of heritage trees</i></p> <p><i>Identifies heritage trees and their physical location. The trees are also identified on the plan maps.</i></p> <p><i>Table 7.6A - Permitted Activity Rules</i></p> <p><i>Enables minor pruning</i></p> <p><i>Rule 7.8 – Restricted Discretionary Activity Rules</i></p> <p><i>Provides for the assessment of emergency tree removal and substantial pruning.</i></p> <p><i>Rule 7.9 – Discretionary Activity Rules</i></p> <p><i>Provides for the assessment of activities within the drip line of a heritage tree.</i></p> <p><i>Rule 7.10 – Non-Complying Activity Rules</i></p> <p><i>The purpose of this rule is to ensure that the city’s heritage tree stock is retained.</i></p>
Costs	<i>Introducing a revised and more specific method of managing the City’s heritage trees has potential additional regulatory costs to land owners and developers.</i>
Benefits	<i>Identifies the city’s heritage trees and provides a clear regulatory framework for the management of those trees.</i>
Risk	<i>By not recognising trees that have a historic connection to the city there is a risk that this component of the city’s heritage can be lost through inappropriate use and development. The proposed policies and methods provide a framework to reduce this risk.</i>
Efficiency	<i>The register of heritage trees and the associated policies and rules clearly signal to the community which trees are considered to be of heritage value and how the potential adverse effects of use and development to this trees will be considered. This is an efficient approach in achieving the objectives.</i>
Effectiveness	<i>The proposed policies and methods are effective because they provide a statutory framework which enables the Council to consider the potential adverse effects of inappropriate use and development in terms of meeting the objective.</i>
Appropriateness	<i>The policies and methods for managing the city’s heritage trees are appropriate to achieve the objective, to give effect to the regional policy statement and to meet the Council’s statutory requirements under section 6(f) of the RMA.</i>

Alternative 1	<i>Status Quo – retain operative plan provisions</i>
Costs	<ul style="list-style-type: none"> • <i>Less cost to developers and land owners resulting from the less structured approach to managing historic heritage.</i> • <i>The degradation of the city's historic heritage resource as growth pressure increases..</i>
Benefits	<i>A less regulated approach to management of historic heritage for developers and landowners.</i>
Risk	<i>The risk to heritage values through maintaining a broad brush management approach which does not recognise specific values or extent of particular items or sites.</i>
Efficiency	<i>Given the changes to the RMA and the direction of the regional policy statement the operative provisions are not considered to be an efficient means of managing historic heritage.</i>
Effectiveness	<i>Given the changes to the RMA and the direction of the regional policy statement retaining the operative provisions is not considered to be effective means of meeting Council's statutory requirements.</i>
Appropriateness	<i>Retaining the operative provisions is not considered to be appropriate in terms of Council's obligations under section 6(e) and (f) of the RMA or the requirements of the regional policy statements</i>

For the proposed policies and methods, the following EREs are anticipated:

- The values of the city's historic heritage are protected through subdivision, use and development.
- An increase in meaningful pre-development consultation with tangata whenua as part of the development process.
- An increase in meaningful pre-development consultation with the Historic Places Trust as part of the development process.
- The Register of Protected Features is kept up to date.

3.6.4 Monitoring Proposed Plan Provisions

ERE	Indicator	Evaluation of Plan Effectiveness
Protection of the city's historic heritage values.	An increase in the number of resource consents for potentially inappropriate subdivision, use and development from the time the proposed plan is adopted.	A comparison between the number of applications received and the number of those applications that were recommended for refusal.
Increase in meaningful pre-development consultation with tangata whenua.	Less resource consent applications are rejected or put on hold for additional information requests.	Comparison of statistics for application rejection and s.92 requests prior to and after adoption of proposed plan.
Increase in pre-development consultation with	Less resource consent applications are rejected or put on hold for additional	Comparison of statistics for application rejection and s.92 requests prior to and after adoption

the Historic Places Trust	information requests.	of proposed plan.
The register of protected features is kept up to date.	The register should not include features that have been removed through a resource consent process.	Where heritage features are removed or amended through a resource consent process internal processes are in place to ensure that both the register and plan maps are amended without requiring a formal plan change.

4 RECOMMENDED OBJECTIVES, POLICIES AND METHODS

The protection of historic heritage and providing for the relationship of Maori culture and conditions is a matter of national importance under the RMA. As such there is a need to ensure that Council is able to sustainably manage development pressure where it has the potential to adversely affect these two matters. This also needs to occur in a manner that is consistent with the direction given through the regional policy statement. The operative plan provisions do not deliver or fulfil these requirements.

The recommended option is considered to provide clear objectives that address the issue which in turn enable an efficient and effective framework of policies and methods to be established which enable the Council to fulfil its statutory obligations of the RMA in a way that provides for the social, economic and cultural well being of people and the community.

5 NOTIFICATION AND RECOMMENDED DECISIONS

This section to be completed following hearings.