



Opotiki District Council

Section 32 Evaluation Report

14. Heritage

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September 2016

1. Introduction

The Opotiki District has a vast heritage resource that comprises land, trees, objects, buildings, structures, and sites that are associated with the past. The Act requires as a matter of national importance that Council shall have particular regard to the recognition and protection of the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga. In addition Council shall recognise and protect the heritage values of sites, buildings, or areas. The heritage resources of the district are important as they connect the past with the present, and contribute to the character of the district. Heritage resources can be a determinant of the future use of a site.

Many heritage resources and values are sensitive to change. Archaeological sites are particularly vulnerable because they are not often recorded nor easily identified without the assistance of archaeologists and people with local knowledge. Over the years there has been a loss of the heritage resources of the District, due to a number of factors, including:

- Lack of understanding by the community that heritage management is about conserving and protecting, not about locking up resources.
- Lack of access to information on the heritage resources.
- No comprehensive identification of the district's heritage resources.
- Ignorance of the effects of land use activities on heritage resources.
- Deficiencies in information held on the heritage resources of the district.
- Public perception that where a resource classified as having heritage status its monetary value decreases.

New land use activities should ensure that waahi tapu, ancestral lands, water, historic sites and buildings, and notable individual trees are protected. Heritage management needs to be consistent across the entire District, and needs to be robust and able to cope with change as registers change and new items are identified, while some items may lose their heritage value.

The New Zealand Archaeological Association (NZAA) maintains an inventory of recorded archaeological sites in the district and the Council holds a copy of this inventory. Under the Heritage New Zealand – Pouhere Taonga Act 2014, an application must be made to Heritage New Zealand – Pouhere Taonga (HNZ) for authority to destroy, damage, or modify any archaeological site, whether or not they have been recorded.

HNZ maintains a register of heritage resources, the New Zealand Heritage List Rarangi Korero. HNZ can place a Heritage Order over any place of special interest, character, intrinsic or amenity value or visual appeal, or of special significance to the tangata whenua for spiritual, cultural, or historical reasons. Heritage Covenants can be taken out by HNZ on a negotiated basis with landowners under the Heritage New Zealand – Pouhere Taonga Act 2014. Council also has this power under the Local Government Act. The Council can make information available through Land Information Memoranda. Some sites will be protected through the District Plan.

Given the statutory requirements and specific provisions of the Heritage New Zealand – Pouhere Taonga Act 2014, Council will work with HNZ to encourage awareness of archaeological sites and other sites of heritage value and will ensure that there is input from iwi and hapū in making decisions.

If changes are needed to include sites identified as being resources or places of heritage value in the District Plan, a plan change will be initiated.

Section 32 of the RMA requires Council to carry out an evaluation before a plan is publicly notified and before making a decision on submissions. The evaluation must examine whether each objective is the most appropriate way to achieve the purpose of the RMA and whether, having regards to their efficiency and effectiveness, the policies and other methods including rules are most appropriate or achieving the objectives. The evaluation must take into account the benefits and costs of policies, rules or other methods, as well as the risk of acting or not acting if there is uncertain or insufficient information about the subject.

This report provides the required evaluation of the objectives, policies and methods including rules relating to the district's heritage resource.

2. Legislative Framework

2.1. Resource Management Act 1991 (RMA)

Section 5 of the RMA sets out the purpose of the RMA as follows:

- (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 well-being 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.*

Section 6 of the RMA requires that the following matters are recognised and provided for: the relationship of Maori and their culture and traditions with ancestral water, waahi tapu and other taonga, and the protection on historic heritage from inappropriate subdivision, use and development. (6(e) and 6(f))

Section 7 also requires that regard is given to a number of matters relevant to heritage, as follows: kaitiakitanga, the ethic of stewardship, and the efficient use and development of natural and physical resources.

Section 31 of the RMA gives Council the responsibility for the integrated management of the actual or potential effects of the use, development of protection of land and associated natural and physical resources of the District.

2.2. National Policy Statements

The Council must give effect to National Policy Statements in the District Plan under sections 55 and 75(3)(a) of the RMA.

New Zealand Coastal Policy Statement (NZCPS)

The NZCPS provides guidance for addressing issues in the coastal environment. The Council must give effect to the provisions of the NZCPS under section 75(3)(b). The NZCPS contains seven objectives and 29 policies, of which the following are most relevant:

- Objective 3, which relates to the principles of the Treaty of Waitangi, the role of tangata whenua as kaitiaki and tangata whenua involvement in the management of the coastal environment
- Policy 6, which refers to buffer areas and sites of historic heritage value
- Policy 17, which requires the protection of historic heritage from inappropriate subdivision, use and development through integrated management by councils with other organisations and including policies, rules and other methods in plans.

The NZCPS acknowledges that the coastal environment will vary from locality to locality. In the Ōpōtiki District, the coastal environment has been mapped in the Operative BOP Regional Policy Statement (RPS).

National Policy Statement on Electricity Transmission 2008 (NPSET)

The NPSET provides objectives and policies to recognise the national importance of the national grid and to guide the effects on and from the national grid in relation to other activities. The NPSET recognises that the National Grid is a physical resource of national significance and that it plays a vital role in the wellbeing of New Zealand, its people and the environment. The NPSET helps to ensure that there is a nationally consistent approach to the National Grid.

2.3. National Environmental Standards

Section 44A of the RMA requires the Council to ensure that a rule in the district plan does not duplicate, or be in conflict with, a national environmental standard. There are five National Environmental Standards (NES):

- National Environmental Standards for Air Quality (NESAQ)
- National Environmental Standards for Sources of Drinking Water (NESWQ)
- National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCO)
- National Environmental Standards for Electricity Transmission Activities 2009 (NESETA)
- National Environmental Standard for Telecommunications Facilities 2008 (NESTF)

Of these, the NESTF and NESETA are relevant. The NESTF requires that telecommunications facilities in a road reserve that are next to historic heritage sites identified in a district plan, then the rules in the district plan must be complied with. Similarly, the NESETA require that historic heritage effects are considered for activities identified as controlled, restricted discretionary and activities, including undergrounding transmission lines, transmission line support structures and earthworks in a historic heritage area.

2.4. Regional Policy Statement

Section 74 of the RMA requires that the District Plan must give effect to the Operative RPS. The RPS identifies the requirement to recognise and provide for matters of national importance, including historic heritage and places of significance to Maori. In particular Objectives 13 and 18 and their policies give guidance to this Plan.

Objective	RPS Objective	Policies	Relevance
13	Kaitiakitanga is recognised and the principles of the treaty of Waitangi (Te Tiriti o Waitangi) are systematically taken into account in the practice of resource management	IW2B IW 5B	Providing for and managing adverse effects on matters of significance to Maori
18	The protection of historic heritage and outstanding natural features and landscapes from inappropriate subdivision, use and development	IW 2B MN 1B MN 8B	Recognise matters of significance to Maori Recognise and provide for matters of national importance Manage the effects of subdivision, use and development

3. Key Issues

3.1 The key issues to be addressed in relation to historic heritage are as follows:

#	Issue	Commentary
1	There is insufficient information on heritage resources that require management and protection	Collating relevant information and making it available to people using and developing land before any work or change is undertaken can require time and resources which are limited, especially where there is inadequate information available.
2	The effects of some land use activities have the potential to adversely affect heritage items, including excavation in, or in close proximity to, the site , and can affect the stability of the foundations of heritage structures.	Work can be undertaken near historic heritage buildings or sites which damage or undermine the building integrity, where people are not aware of the values of the heritage resource.
3	Earth moving and excavation activities can affect the root systems of notable trees within the district	Earthworks need to be set back from the root zone of notable trees as they can damage or destroy the tree.
4	The need to recognise and protect Māori heritage sites as a matter of national importance, whilst in many cases ensuring that the exact location of such sites is not disclosed	A process is required to alert potential developers to the need to consult with local iwi where sensitive areas may be affected, without disclosing secret information.
5	Public access to many sites of cultural significance may compromise the character or values of the heritage site	Providing for access change the visual appearance and detract from the mauri of a site.
6	There are a large number of unrecorded sites which may be changed or destroyed where landowners are unaware of their existence	It is important to increase public awareness of that archaeological sites may be within their sites and that the law applies whether or not they are identified.

4. Summary of Plan Provisions

The issues, objectives, policies, rules and other provisions and their relationship in the PDP are set out in the following table.

Issue	Objective	Policies	Rules	Other Methods
14.1.1	14.2.1, 14.2.2	14.2.1.1, 14.2.2.1, 14.2.2.2, 14.2.2.3	14.3.2.1.1, 14.4.1.2, 14.4.1.3, 14.4.1.4, 14.4.1.5, 14.6, 14.9.1	14.7.1.1, 14.7.1.2, 14.7.1.3, 14.7.1.4
14.1.2	14.2.1, 14.2.2	14.2.1.2, 14.2.1.4	14.3.2.1.2, 14.3.5.2, 14.3.5.3	14.7.1.2
14.2.3	14.2.1	14.2.1.3	14.3.2.1.3, 14.3.3.1-2, 14.3.4.2, 14.3.5.3, 14.3.6.1.3, 14.4.1.1, 14.9.2	14.7.1.1, 14.7.1.2
14.2.4	14.2.2, 14.2.3	14.2.3.1, 14.2.3.2, 14.2.3.3, 14.2.3.4	14.9.1, 14.6	14.7.1.4
14.2.5	14.2.1, 14.2.2	14.2.1.1, 14.2.3.3	14.3.2.1.2, 14.3.3.1.1, 14.6	14.7.1.2
14.2.6	14.2.2, 14.2.3	14.2.2.1, 14.2.2.2, 14.2.2.3, 14.2.3.1, 14.2.3.2	14.6	14.7.1.1, 14.7.1.2, 14.7.1.4

5. Changes Made to ODP Approach

- 5.1 The ODP has a standalone chapter on historic heritage and few material changes have been made.
- 5.2 A number of minor amendments have been made to the objectives, policies, rules and other methods to clarify provisions where unclear, delete unnecessary text and update references. In particular the relevant legislation is now Heritage New Zealand Pouhere Taonga 2014 and the authority is Heritage New Zealand Pouhere Taonga. These references have been updated.
- 5.3 Rules are the principal method for managing the effects of activities on historic heritage which are listed in the plan. They are supported by other methods. Increasing awareness of historic heritage and the requirement to protect and sustain the associated values is a key requirement.

6. Evaluation – Appropriateness of Objectives

- 6.1 Objectives are to be assessed as to whether they are the most appropriate to achieve the purpose of the RMA. ‘Most appropriate’ has been interpreted to mean ‘suitable’.

	Objectives	Appropriateness
14.2.1	To recognise and protect the heritage values of resources, including buildings, objects, trees, and archaeological sites	Addresses Issues 14.1.1, 2, 3, 5. Section 5: The objective will achieve the purpose of the RMA by managing the use, development and protection of natural and physical resources, in relation to historic heritage and sites of cultural value.

		<p>Section 6: The objective recognises the need to provide protection of historic heritage and sites of significance to Maori which are matters of national importance identified in sections 6(e) and (f).</p> <p>Section 7: The objective provides for the management of activities that could adversely affect the quality of the environment, recognises kaitiakitanga and the ethic of stewardship, while enabling use and development of affected resources where this is compatible with protecting their values. This is in accordance with sections 7(a), (aa), (b), and (f).</p> <p>Section 8: The objective is consistent with the principles of the Treaty.</p> <p>RPS: It gives effect to Objectives 13 and 18 of the RPS and policies IW2B, IW5B, MN1B and MN8B.</p>
14.2.2	To improve public awareness of the heritage resources that exist in the district, and to improve community commitment to the recognition and protection of these resources.	<p>Addresses Issues 14.1.1, 2, 4, 6.</p> <p>Section 5: The objective will promote the purpose of the RMA, with a focus on protection of historic heritage and cultural values to enable people and their communities to provide for their social, economic and cultural wellbeing.</p> <p>Section 6: The objective provides for the matters of national importance identified in section 6(e) and 6(f).</p> <p>Section 7: The objective recognises and provides for the management of activities in accordance with section 7(a), (aa), (b), and (f).</p> <p>Section 8: The objective is consistent with the principles of the Treaty.</p> <p>RPS: It gives effect to Objectives 13 and 18 of the RPS and policies IW2B, IW5B, MN1B and MN8B.</p>
14.2.3	To recognise and provide for sites of cultural significance identified in Iwi and Hapū resource management plans	<p>Addresses Issue 14.1.4.</p> <p>Section 5: The objective will promote the purpose of the RMA, with a focus on protection of sites of cultural value to enable people and their communities to provide for their social and cultural wellbeing.</p> <p>Section 6: The objective provides for the matters of national importance identified in section 6(e).</p> <p>Section 7: The objective recognises and provides for the management of activities in accordance with section 7(a) and (aa).</p>

		<p>Section 8: The objective is consistent with the principles of the Treaty.</p> <p>RPS: It gives effect to Objectives 13 and 18 of the RPS and policies IW2B, IW5B, MN1B and MN8B.</p>
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6.2 These objectives are considered to be the most appropriate methods of achieving the purpose of the RMA as they recognise the matters set out in Part 2 of the RMA, they give effect to the relevant objectives and policies in the RPS, and they will guide the appropriate management of historic heritage in the district.

7. Evaluation – Achieving the Objectives

7.1 Section 32(1)(b) Requirements

Section 32(1)(b) of the RMA requires examination of whether the provisions (being policies, rules and other methods) in the Proposed Plan are the most appropriate way to achieve the objectives. The appropriateness must be considered in relation to:

- “(i) identifying other reasonably practicable options for achieving the objectives; and*
- (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
- (iii) summarising the reasons for deciding on the provisions”.*

These are set out below.

The assessment must be at a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects of the Proposed Plan. The Operative District Plan contains an existing chapter, Chapter 4, to address the management of the district’s historic heritage. As set out in section 5 above, the approach taken in the Proposed District Plan is to amend the provisions only where necessary to:

- Clarify the provisions;
- Improve consistency across the Plan;
- Respond to new statutory requirements, such as through a national or regional policy statement;
- Delete unnecessary text;
- Update references.

Only where there are new statutory requirements through a national policy statement or regional policy statement have new provisions been introduced. A change in activities or the way they are managed requires examination of the provisions in more detail.

Therefore, as the plan provisions, being policies and rules, have not materially changed and are generally well understood and accepted as appropriate mechanisms to achieve environmental outcomes sought through the district plan, a detailed re-examination of the plan provisions is not considered to be necessary.

7.2 Reasonably Practicable Options

In terms of reasonably practicable options, as discussed above, the plan provisions have been generally carried forward. The reasonably practicable options are therefore considered to be:

Options	Response
Do nothing	<ul style="list-style-type: none"> ▪ No policy or rule in the plan. ▪ Rely on other non-statutory methods as set out in the chapter ▪ BOPRC plan provisions address the issue and duplication is unnecessary
Status Quo	<ul style="list-style-type: none"> ▪ Carry forward the policy or rule without change or with only minor amendment
New policy or provision	<ul style="list-style-type: none"> ▪ Address an issue that is not addressed or is ineffective in the operative plan ▪ Give effect to a new requirement in a NPS or RPS ▪ Align with plans or other statutory documents

The plan provisions have been generally carried forward with minor amendments to clarify and improve consistency across the plan and with other documents. The status of activities and standards to be applied are well known to the community and well understood. The list of identified historic heritage has been updated.

The “Do Nothing” option has not been selected as it is not acceptable where a policy or rule is required to achieve the purpose of the RMA and the objectives set out above. Either the status quo (with or without minor amendments for clarification) or a new provision have been assessed as reasonably practicable options. The proposals are concluded to be the only reasonably practicable options to evaluate.

7.3 Policies and methods

7.3.1 Efficiency and Effectiveness

In assessing the efficiency and effectiveness of the proposed provisions, the RMA requires the Council to “*identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for:*

- (i) *economic growth that are anticipated to be provided or reduced; and*
- (ii) *employment that are anticipated to be provided or reduced”.*

If practicable, the benefits and costs referred should be quantified.

7.3.2 Efficiency

The proposed policies will be efficient in achieving the objectives as they give clear direction for potential activities on heritage resource and guidance for decision makers.

7.3.3 Effectiveness

Objective 14.2.1

Issue relationship	14.1.1, 2, 3, 5
Objective 14.2.1	To recognise and protect the heritage values of resources, including buildings, objects, trees, and archaeological sites
Policies 14.2.1.1	Ensure that modification, damage or destruction of any heritage resource

<p>14.2.1.2</p> <p>14.2.1.3</p> <p>14.2.1.4</p>	<p>listed in Appendix 14.7 is undertaken in accordance with the Heritage NZ Pouhere Taonga Act 2014, so that alterations do not adversely affect the heritage values of the site.</p> <p>Ensure signs on scheduled features or sites on which they are located do not adversely affect heritage values and avoid unnecessary or inappropriate signage.</p> <p>Ensure notable trees are protected from the adverse effects of subdivision, use and development activities, including activities located close to identified trees.</p> <p>Encourage and facilitate the strengthening of buildings included in the heritage appendix to increase their ability to withstand future earthquakes while minimising the significant loss of associated heritage values.</p>
<p>Methods</p>	<p>Methods to give effect to the policies relate to:</p> <ul style="list-style-type: none"> ▪ The status of activities, being permissive for low impact activities which will not damage the integrity of the resource ▪ Requiring consent as a restricted discretionary or discretionary activities enables all relevant effects to be evaluated ▪ Enabling controls to be imposed through the consent process activities that will alter or damage the heritage resource or its values ▪ The use of the restricted discretionary classification to allow activities to be considered in relation to relevant potential effects and may enable the establishment of activities which have economic benefits to the community ▪ Working with HNZ to identify the values of the resource and whether changes are acceptable ▪ Requiring a report from a suitably qualified arborist to support any proposed works that may affect a notable tree. ▪ Encouraging public awareness and understanding of the reasons why heritage resources are protected and how the values can be easily lost.
<p>Benefits</p>	
<p>Environmental benefits</p>	<ul style="list-style-type: none"> ▪ Will protect the heritage values of the resource. ▪ Will enable essential repairs to be undertaken, such as for earthwork strengthening. ▪ Clear benefits to the environment through giving clear direction to prioritise heritage values over works ▪ Will enable the specific effects on the heritage resource to be considered ▪ Well used approach which achieves the purpose of the Act in a way that is consistent with the objectives
<p>Economic Benefits</p>	<ul style="list-style-type: none"> ▪ Provides certainty about the types of issues to be addressed for proposed activities that may affect heritage resource and notable trees ▪ Protecting heritage resource contributes to the character of the District and may result in economic benefits ▪ Greater certainty about the purpose of controls imposed

	<ul style="list-style-type: none"> ▪ Minor works are allowed without consent
Social Benefits	<ul style="list-style-type: none"> ▪ Supports the retention of historic heritage in the District which contributes to community values and wellbeing ▪ Risk of social costs is reduced by having the policy and requiring resource consents for any significant works
Cultural Benefits	<ul style="list-style-type: none"> ▪ Will reduce loss of resource that is important to the wellbeing of the District and its cultural values ▪ Managing adverse effects in relation to potential loss of historic resource will result in cultural benefits ▪ Risk of cultural costs is reduced by having the policies ▪ Provide for management of relevant effects which may include cultural values
Costs	
Environmental Costs	<ul style="list-style-type: none"> ▪ Risk of environmental effects is addressed through the policies ▪ Some opportunity remains for activities to adversely affect the environment, through lack of awareness of rules
Economic Costs	<ul style="list-style-type: none"> ▪ May be increased application costs associated with management of activities ▪ The policy may result in higher costs for owners or occupiers of sites listed in the plan
Social Costs	<ul style="list-style-type: none"> ▪ Some activities may be limited where they would compromise the heritage values of the resource
Cultural Costs	<ul style="list-style-type: none"> ▪ No cultural costs identified
Risk of Acting or Not Acting	Risk is a factor of potential consequences and the likelihood of a consequence occurring.
	The risk of not acting would lead to lack of control over activities that could damage or destroy heritage resource. This outcome is not consistent with the achieving the purpose of the RMA. There is sufficient information known about the consequences
Overall Assessment	The inclusion of the provisions above is supported as enabling the purpose of the RMA to be achieved including sections 6 and 7 matters.

Objective 14.2.2

Issue relationship	14.1.1, 2, 3, 4, 6
Objective 14.2.2	To improve public awareness of the heritage resources that exist in the district, and to improve community commitment to the recognition and protection of these resources.
Policies	
14.2.2.1	Identify the resources within the district that have heritage value.
14.2.2.2	Provide community and resource consent applicants information on heritage resources, so that a better understanding of potential effects can be obtained.
14.2.2.3	Recognise the role of, and work with, other agencies (and legislation) such as the New Zealand Historic Places Trust and New Zealand Archaeological Association
Methods	Methods to give effect to the policies relate to: <ul style="list-style-type: none"> ▪ Identifying listed sites in the district plan and on planning maps.

	<ul style="list-style-type: none"> ▪ Providing information on the Council website and through Land Information memoranda ▪ Requiring consent as a restricted discretionary or discretionary activities enables all relevant effects to be evaluated ▪ Working with HNZ to identify the values of the heritage resource and provide information about identified sites ▪ Working with NZAA to promote awareness of archaeological sites, known and unknown. ▪ Using the Council website, Council newsletters and other media to increase public awareness and understanding of the reasons why heritage resources are protected and how the values are vulnerable.
Benefits	
Environmental benefits	<ul style="list-style-type: none"> ▪ Maintains awareness of the need to increase public knowledge of the heritage resource of the District. ▪ Likely to be environmental benefits if people become more aware of the issues around heritage resource protection ▪ Promotes cooperation with HNZ and NZAA ▪ Well understood approach that is consistent with the objectives
Economic Benefits	<ul style="list-style-type: none"> ▪ Increased public knowledge and understanding will not be a direct cost on the public ▪ Increased public knowledge will reduce loss of heritage resource ▪ Greater understanding will support a higher level of compliance
Social Benefits	<ul style="list-style-type: none"> ▪ Increased knowledge of heritage resource will benefit the community ▪ Provides support for working with HNZ and NZAA ▪ Protecting heritage resource supports social outcomes in relation to shared history and values
Cultural Benefits	<ul style="list-style-type: none"> ▪ Encourages protection of historic heritage ▪ Maintains the heritage resource in the District
Costs	
Environmental Costs	<ul style="list-style-type: none"> ▪ No environmental costs likely ▪ Failure to provide information at the correct time could result in loss of heritage resource
Economic Costs	<ul style="list-style-type: none"> ▪ Cost of research and working with other agencies ▪ Cost of maintaining records and providing information
Social Costs	<ul style="list-style-type: none"> ▪ No social costs identified
Cultural Costs	<ul style="list-style-type: none"> ▪ No cultural costs identified
Risk of Acting or Not Acting	<p>Risk is a factor of potential consequences and the likelihood of a consequence occurring.</p> <p>The risk of not acting may lead to lack of information being provided and lack of protection, resulting in degradation or loss of heritage resource and the values to the community. There may be consequentially loss of social and economic opportunities.</p> <p>The risk of not acting is not consistent with achieving the purpose of the RMA, and especially section 6 and 7.</p> <p>There is sufficient information known about the consequences</p>
Overall Assessment	<p>The inclusion of the provisions above is supported as enabling the purpose of the RMA to be achieved including sections 6 and 7 matters.</p>

Objective 14.2.3

Issue relationship	14.1.4
Objective 14.2.3	To recognise and provide for sites of cultural significance identified in Iwi and Hapū resource management plans
Policies	
14.3.2.1	Recognise that Iwi and Hapū have sites of special importance that they may not wish to publicly disclose and ensure that these sites are treated and protected in accordance with Iwi and Hapū wishes.
14.3.2.2	Encourage the development of Iwi and Hapū resource management plans that provide information about sites of cultural significance.
14.3.2.3	Ensure subdivision use and development does not depreciate the relationship tangata whenua has with its taonga.
14.3.2.4	Recognise that only tangata whenua can identify and evidentially substantiate their relationship and that of their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga
Methods	Methods to give effect to the policies relate to: <ul style="list-style-type: none"> ▪ The status of activities, requiring consent where cultural values of significant sites may be affected or lost ▪ Specifying criteria for evaluating discretionary activities that include the importance of a place to tangata whenua and under the heritage New Zealand Pouhere Taonga Act 2014. ▪ Work with iwi and hapū to develop appropriate processes for requiring consent and including criteria for assessment.
Benefits	
Environmental benefits	<ul style="list-style-type: none"> ▪ Will help to achieve protection and appropriate management of potential effects on sites of cultural significance to iwi and hapū.
Economic Benefits	<ul style="list-style-type: none"> ▪ Maintaining the cultural integrity of the cultural resources supports a stronger community
Social Benefits	<ul style="list-style-type: none"> ▪ Protects cultural resources which support social wellbeing of the community
Cultural Benefits	<ul style="list-style-type: none"> ▪ Protects sites of significance to iwi and hapū ▪ Requires consideration of cultural values in consent processes ▪ Maintains the relationship of iwi and hapū with places of significance ▪ Requires the Council to work with iwi and hapū to identify and protect sites of cultural significance
Costs	
Environmental Costs	<ul style="list-style-type: none"> ▪ No environmental costs identified
Economic Costs	<ul style="list-style-type: none"> ▪ Economic costs may be incurred in achieving the outcome sought by the policies
Social Costs	<ul style="list-style-type: none"> ▪ Some activities may be limited where they would compromise the values of the site
Cultural Costs	<ul style="list-style-type: none"> ▪ No cultural costs identified
Risk of Acting or Not Acting	Risk is a factor of potential consequences and the likelihood of a consequence occurring.
	The risk of not acting may lead to activities on sites of cultural significance and result in damage to cultural values, with consequential loss of social and economic wellbeing.

	The risk of not acting is not consistent with achieving the purpose of the RMA, and especially section 6 and 7. There is sufficient information known about the consequences
Overall Assessment	The inclusion of the provisions above is supported as enabling the purpose of the RMA to be achieved including sections 6 and 7 matters.