

**BEFORE THE INDEPENDENT HEARINGS PANEL**

**UNDER THE**

Resource Management Act 1991

**IN THE MATTER OF**

Plan Change 9 (Historic Heritage and Natural Environment) to the Hamilton City Operative District Plan – Built Heritage, Stage 1

**IN THE MATTER OF**

Submission 341 of the New Zealand Police Nga Pirihimana o Aotearoa

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**STATEMENT OF EVIDENCE OF GRANT ECCLES ON BEHALF OF NEW  
ZEALAND POLICE NGA PIRIHIMANA O AOTEAROA**

Planning

22 September 2023

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## **1 INTRODUCTION**

- 1.1 My full name is Grant Robert Eccles.
- 1.2 I am a Technical Director - Planning for Tonkin and Taylor Limited, based in Hamilton.
- 1.3 I hold the qualification of a Bachelor of Resource and Environmental Planning from Massey University. I have 28 years' professional planning experience and have been a planning consultant based in Hamilton for the last 26 years. As a result, I have worked with various versions of the Hamilton City Operative District Plan (*Operative District Plan*), and I am familiar with the historic and current resource management issues facing Hamilton City. I was admitted as a Member of the New Zealand Planning Institute in 2001.
- 1.4 I am familiar with, and have experience in, both the preparation of plans and the processing of resource consents under the Resource Management Act 1991 (*RMA*). Throughout my career I have prepared submissions on District and Regional planning documents throughout the North Island on behalf of numerous clients in the private and public sectors.
- 1.5 I have given expert planning evidence at local authority hearings, Environment Court, District Court, and Board of Inquiry hearings. I have provided planning assistance to the Boards of Inquiry established to hear the applications for the Te Mihi and Tauhara II Geothermal developments near Taupō, and the King Salmon plan change and consent applications in the Marlborough Sounds.
- 1.6 From 2008 to 2013 I lead the review of the Ruapehu District Plan, from the inception of consultation through to the resolution of Environment Court appeals. In part, that involved co-ordinating a review of the heritage buildings, infrastructure (e.g. historic railway viaducts) and other items in the Ruapehu District and preparing updated District Plan heritage provisions.
- 1.7 I have been engaged by New Zealand Police Nga Pirihiama o Aotearoa (*NZ Police*) in respect of its submission on Plan Change 9 (Historic Heritage and Natural Environment) to the Operative District Plan (*PC9*).

I reviewed that submission (prepared by one of my colleagues) before it was lodged on behalf of NZ Police, as well as the submission from Tainui Group Holdings Limited (*TGH*).

1.8 Both the NZ Police and TGH submissions oppose:

- (a) the proposed scheduling of the Hamilton Central Police Station (*the Station*) located at 12 Anzac Parade, Hamilton (*the Site*) as a "B" Ranked Heritage Item in Schedule 8A of the Operative District Plan;
- (b) the proposed amendments to a rule within the Operative District Plan which would classify demolition of a "B" Ranked building as a discretionary activity; and
- (c) the proposed identification of the street trees located along the frontage of the Station as notable trees under Schedule 9D of the Operative District Plan.

### **Code of conduct**

1.9 I confirm that I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

## **2 SCOPE OF EVIDENCE**

2.1 My evidence is presented on behalf of NZ Police and addresses planning matters associated with the proposed scheduling of the Station.

2.2 Specifically, it:

- (a) summarises the planning framework that currently applies to the Site;

- (b) addresses the methodology used by Hamilton City Council (*HCC or Council*) to identify the values of the prospective heritage items;
- (c) assesses the planning framework proposed to apply to the Station; and
- (d) responds to relevant planning matters raised in the section 32 assessment, HCC's 'themes and issues' section 42A report (*Section 42A Report*), and the evidence presented on behalf of HCC.

2.3 In preparing my evidence, I have reviewed:

- (a) The PC9 provisions and the supporting section 32 assessment.
- (b) Submissions on behalf of NZ Police and Waikato Tainui, as well as other relevant submissions.
- (c) The Section 42A Report.
- (d) The evidence of Ms Laura Galt and Ms Elise Caddigan on behalf of HCC.
- (e) The expert evidence filed by NZ Police from Superintendent Bird (NZ Police Waikato District Commander), and Mr Wild and Ms Cassin (Heritage Assessment Methodology).

### **3 THE SITE**

- 3.1 The Site is located at 12 Anzac Parade in Hamilton, shown at Figure 1 below. It contains the station and ancillary storage, carparking and access facilities. A police station has existed on the Site since the early 1900s.

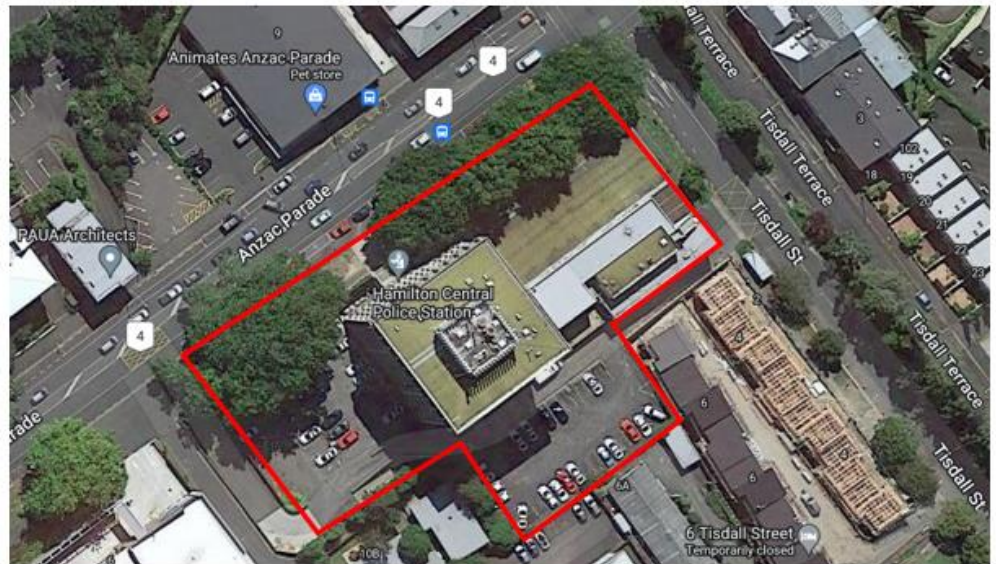


Figure 1: Site and Station

3.2 The current Station (Figure 2 below) was constructed in the mid-1970s and became operational in 1976. It replaced a station building constructed in the 1940s.



Figure 2: Current Station, viewed from Anzac Parade

3.3 The Site is owned by TGH, the commercial arm of Waikato-Tainui. Ownership of the Site was returned to Waikato-Tainui as part of the Deed of Settlement of the Waikato Raupatu Claims Settlement Act

1995. NZ Police occupy the Site on the basis of a ground lease that expires in 2032. The terms of the ground lease require that at the expiry of the lease the Site must be left clear and unencumbered of buildings and contamination. This requirement applies to all land that was returned to Waikato-Tainui in the 1995 Te Tiriti o Waitangi settlement, and ensures that land is returned in a state ready to be developed as required.

- 3.4 These Te Tiriti o Waitangi settlement-derived circumstances are (in terms of the buildings proposed to be scheduled by PC9) unique to the Site and are relevant in determining the appropriateness or otherwise of the scheduling of the Station as proposed in PC9.
- 3.5 The Site is zoned Central City in the Operative District Plan and is within the Ferrybank Precinct 3. The Site is subject to a designation (D46) for “Police Purposes”. There are no conditions applying to the designation.
- 3.6 Plan Change 12<sup>1</sup> (PC12) to the Operative District Plan is HCC’s Intensification Planning Instrument under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, and a response to Policy 3 of the National Policy Statement for Urban Development (NPS-UD). Amongst other things, PC12 proposes to prioritise greater intensification of residential/apartment development in the Central City zone (which applies to the Site).
- 3.7 The Station is not currently listed in Appendix 8: Heritage of the Operative District Plan, and neither are any other emergency service facilities.<sup>2</sup> Thus, prior to the advent of PC9, demolition of the Station was a permitted activity in the Central City zone.<sup>3</sup>
- 3.8 If PC9 is approved as notified, demolition of the Station would require consent as a discretionary activity.<sup>4</sup> If the relief sought by NZ Police is granted, demolition would remain a permitted activity.

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<sup>1</sup> Currently on hold pending progression of a separate flood hazard plan change by HCC.

<sup>2</sup> Defined in the Operative Hamilton City District Plan (*Operative District Plan*) as “those facilities of organisations which are responsible for the safety and physical welfare of people or property in the community, and includes fire, ambulance and police stations.”

<sup>3</sup> Operative District Plan Rule 7.3e.

<sup>4</sup> PC9, Rule 19.3.1.

#### **4 RMA AND HDP HERITAGE PROVISIONS**

- 4.1 The genesis of PC9 stems from the requirement of section 6(f) of the RMA to recognise and provide for the protection of historic heritage<sup>5</sup> from inappropriate subdivision, use and development. As Ms Galt sets out in her evidence for HCC,<sup>6</sup> the last city-wide stock take of built heritage in Hamilton was undertaken in the late 1990s.
- 4.2 In my view, given that the Site is owned by Waikato-Tainui and was returned to them through the 1995 Te Tiriti o Waitangi settlement, section 6(e) of the RMA (recognise and provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga) is also equally relevant when considering the appropriateness or otherwise of the proposed scheduling of the Station. I address this matter later in this evidence.
- 4.3 The built heritage components of the Operative District Plan are found in Chapter 19 (Historic Heritage), Schedule 8A (the list of protected heritage buildings and other items), Appendix 1.1 – Definitions, Appendix 1.2 (Information Requirements) and Appendix 1.3 Assessment Criteria).

#### **5 PC9 METHODOLOGY**

- 5.1 The proposed scheduling of the Station responds to the heritage assessment undertaken by WSP on the instructions of HCC (*HCC Heritage Assessment*).<sup>7</sup> That assessment found that the Station warranted inclusion in the schedule as a “B” ranked heritage building (having significant heritage value) because of its:
- high historic and physical/aesthetic/architectural qualities’; and
  - ‘moderate’ context or group values, and technological qualities.
- 5.2 The methodology used in PC9 to identify additional items for scheduling in the Operative District Plan is described in Appendix 8 of the section

<sup>5</sup> As defined in Resource Management Act 1991, section 2.

<sup>6</sup> Evidence of Laura Galt, [9].

<sup>7</sup> PC9, section 32 Assessment, Appendix 8: Built Heritage Methodology Report and Inventories: Hamilton City Council Heritage Inventory Report (2 June 2022), Appendix A, Central Police Station (*HCC Heritage Assessment*).

32 assessment. According to the Section 42A Report,<sup>8</sup> that methodology built on the existing methodology within the Operative District Plan for evaluating historical significance. The additional items that have been proposed for scheduling were subject to further review by Ms Caddigan, using the methodology described in her evidence.

- 5.3 While I rely on the expert opinions of Mr Wild and Ms Cassin in terms of detailed methodological matters, I note here that in my view the methodology used for PC9 overall is disconnected from relevant strategic provisions within the Operative District Plan relating to the values, aspirations and role of Waikato-Tainui as tangata whenua.
- 5.4 Objective 2.2.9 of the Operative District Plan requires that resource management priorities are developed in partnership with tangata whenua, while Policy 2.2.9a requires that "the relationship tangata whenua have with the City is recognised and promoted." Further, Policy 2.2.9b specifies that "development considers effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to an area."
- 5.5 Given the reasons why, and the manner in which the Site was returned to Waikato-Tainui ownership, this is a particularly relevant matter of consideration for the proposed scheduling of the Station. I understand from speaking with TGH staff that Waikato-Tainui regard the continuing presence of the Station on returned tribal land as a cultural affront, and a continual reminder of grievances held by Waikato-Tainui in terms of their relationship with the Crown.
- 5.6 Given that position, and the fact that no specific consultation occurred with Waikato-Tainui as the owner (via TGH) of the Site and Station (resulting in the submission in opposition to the scheduling), I do not view the assessment methodology used in the preparation of PC9 as it relates to heritage buildings as consistent with the Operative District Plan provisions set out above.

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<sup>8</sup> PC9: Themes and Issues Report, Hearing Session 1: Historic Heritage Areas; Significant Natural Areas; and Notable Trees (22 May to 7 June 2023), pages 28 and 29.



## 6 PC9 PLANNING ASSESSMENT/PLANNING FRAMEWORK

### NPS-UD

- 6.1 PC9 must give effect to the NPS-UD.<sup>9</sup> The provisions of the NPS-UD that I consider are relevant are set out in **Appendix A** to my evidence.
- 6.2 For the purposes of the NPS-UD, the Station is a component of the Hamilton urban environment. In that context, scheduling the Station would not, in my opinion give effect to the relevant NPS-UD provisions for the following reasons:
- (a) In light of Waikato-Tainui's submission, it would not provide for the cultural well-being of Waikato-Tainui (Objective 1) and would not appropriately take into account the principles of Te Tiriti o Waitangi (Objective 5) nor the values and aspirations of Waikato-Tainui for the long-term urban development of the Site (Policy 9). Mr Wild and Ms Cassin in their analysis at Appendix 1 of their evidence note that the negative association Waikato-Tainui have with the Station has not been considered in the HCC Heritage Assessment analysis of *Associative Value* and *Historical Pattern*.
  - (b) The potential inability to demolish the Station would mean, in light of its significant structural and servicing issues which create very significant barriers to adaptive re-use of it for residential purposes, the residential intensification opportunity at the City Centre zoned site would be lost, which would be inconsistent with the outcomes required by Objective 3 and Policy 3.
  - (c) It would not recognise that the nature of the development on the Site needs to be able to change over time in response to the changing circumstances of the Site's ownership (Objective 4).
  - (d) Equally it would not recognise that the nature of the development on the Site needs to be able to change over time in response to the requirements of the NZ Police (Objective 4)
  - (e) As set out in the evidence of Mr Wild and Ms Cassin, the development of the heritage building components of PC9 has not

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<sup>9</sup> Resource Management Act 1991, section 75(3)(a).

been based on a robust methodology nor has all the relevant information about the Site been used to inform the planning decision to schedule the Station (Objective 7).

### **Waikato Regional Policy Statement**

- 6.3 PC9, as a change to the Operative District Plan, must give effect to the Waikato Regional Policy Statement (WRPS).<sup>10</sup> The provisions of the WRPS that I consider relevant to the historic heritage aspects of PC9, and the Station specifically, are set out in **Appendix A** to my evidence.
- 6.4 The evidence of Mr Wild and Ms Cassin is that the existing Operative District Plan heritage assessment methodology is generally aligned with the historic and cultural heritage assessment criteria found in the WRPS.<sup>11</sup> From my own review of the respective Operative District Plan and WRPS assessment criteria, which I acknowledge is limited to a non-heritage expert plain reading of the criteria, I agree with their position. The HCC Heritage Assessment methodology “rationalised and evolved” the Operative District Plan criteria without any reported clarity on why or how this occurred.
- 6.5 In my view, as addressed in more detail in the evidence of Mr Wild and Ms Cassin, in electing not to undertake the assessment of potential heritage buildings in accordance with the existing Operative District Plan criteria, nor the extensive criteria in Appendix 7 of the WRPS as required by Method HCC-M3 of the WRPS, there is doubt as to whether PC9 at a fundamental assessment level actually gives effect to the WRPS, as the higher order document. Further, in light of the circumstances involved with the Site and Station as set out earlier in this evidence, I am also of the view that the proposed scheduling of the Station would not give effect to WRPS Objectives IM-01, IM-07 or IM-08.
- 6.6 In reaching this view I have considered that the Station is a “natural and physical resource” as defined by the WRPS and the RMA.<sup>12</sup> In accordance with Objective IM-01, it therefore needs to be managed in

<sup>10</sup> Resource Management Act 1991, section 75(3)(c).

<sup>11</sup> See evidence of Mr Wild and Ms Cassin, [6.7].

<sup>12</sup> Includes land, water, air, soil, minerals, and energy, all forms of plants and animals (whether native to New Zealand or introduced), and all structures.

a way that recognises the needs of current and future generations and the need to work with the relevant agencies, landowners, resource users and communities. Scheduling the Station (with all its attendant functional, structural, and land tenure issues) and requiring a resource consent application for its demolition (that could be declined) does not recognise these relevant Objective IM-01 matters.

- 6.7 In my opinion, having reviewed the unambiguous submission made on behalf of TGH, scheduling the Station would also not recognise or provide for the relationship of Waikato-Tainui with the Site and their role as kaitiaki (Objective IM-07), nor would it represent a sustainable or efficient use of the Site and Station (Objective IM-08). I note that neither Ms Caddigan nor Ms Galt have provided any evidence to address these critical considerations.

### **Section 32 considerations**

- 6.8 The assessment methodology fails to contain a level of detail that corresponds to the cultural effects that can reasonably be anticipated from the implementation of PC9, as required by section 32(c) of the RMA. From my review of the available information, it does not appear that HCC or WSP have considered the cultural effects on Waikato-Tainui of the scheduling of the Station at all, which is necessary given the history of the Site and the nature of its ownership.
- 6.9 Further, neither HCC nor WSP appear to have considered or attempted to quantify the costs associated with scheduling of the Station. As set out above, under PC9, resource consent would need to be obtained for demolition of the Station which is a shift from the current regime under the Operative District Plan where that activity could occur as of right. The process of securing resource consent for demolition could be subject to a notified and contested process, which could incur significant additional cost to NZ Police (and thus the taxpayer). Those costs in the context of the effectiveness and efficiency analysis required under section 32 do not appear to have been assessed.
- 6.10 Neither has the quite significant cost to the taxpayer of the worst-case scenario occurring of consent for the demolition ultimately being declined, meaning the Crown/NZ Police would have to vacate the Site

on terms inconsistent with the ground lease. If that happens, I understand that the financial penalties payable by the Crown to Waikato-Tainui are severe.

- 6.11 The costs to Waikato-Tainui of then being left with a substantial building on the Site that is unable to be adaptively re-used, but cannot be demolished, rendering the Site effectively useless in terms of development potential, would be extraordinary. All of these costs, the potential for which to occur are generated by the proposed scheduling of the Station, weigh heavily against the proposed scheduling when considered in a section 32 context.
- 6.12 Further, as discussed above (particularly with regard to Objective 7 of the NPS-UD), and as set out in the evidence of Mr Wild and Ms Cassin, I consider that the information that has been relied upon to justify the proposed scheduling of the Station is tenuous in terms of the matters that have contributed to its 'high' and 'moderate' rankings. On that basis, the heritage values of the Station are not well-substantiated, and given the significant constraints and costs that will be generated by the proposed scheduling, the risk of acting (i.e. confirming the scheduling) in the face of the uncertain or insufficient information is in my opinion too high.<sup>13</sup>

### **Operative Hamilton City District Plan**

- 6.13 In section 5 of this evidence I have addressed the other provisions of the Operative District Plan itself that lead me to believe that scheduling of the Station is inappropriate.
- 6.14 In my view it is necessary to view the Station as part of a continuum of use for the Site as an operational policing facility. Policing needs and approaches change over time (as explained in the evidence of District Commander Bird) and the buildings used for policing need to be able to change accordingly, as evidenced by the fact that the existing Station replaced the prior police station building that had become unfit for purpose at the time nearly 50 years ago.

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<sup>13</sup> Resource Management Act 1991, section 32(2)(c).

- 6.15 Almost perversely, this is recognised in the HCC Heritage Assessment as a contributing factor to the scheduling of the Station, as follows:<sup>14</sup>

The place has moderate significance with regard to historic patterns in the region. The site was originally occupied by a previous Police Station, which was replaced by the current iteration in the early 1970's. The current building demonstrates patterns of upgrading existing facilities when they became outdated due to social and economic changes for the region.

- 6.16 As Superintendent Bird has explained in his evidence, the current Station is outdated, no longer fit for purpose in a modern policing environment, and has significant structural and services issues. Requiring a resource consent for it to be demolished (which could potentially be refused given the discretionary status) will inhibit the ability of TGH to effectively utilise the Site when the NZ Police ground lease ends. It is also inconsistent with the lease arrangement between NZ Police and Waikato-Tainui, secured as part of Te Tiriti o Waitangi Settlement, in which NZ Police committed to demolishing the Station before the end of the lease.

- 6.17 In light of the above, scheduling the Station on land returned to Waikato-Tainui would not be consistent with the new policy 19.2.1d proposed by PC9 that requires:

The relationship Mana Whenua have with both the whenua and awa, and the spiritual, cultural and/or historical significance of the whenua and awa has to Mana Whenua shall be recognised and provided for.

- 6.18 I address further provisions of the Operative District Plan and PC9 in the following section of my evidence.

## **7 RESPONSE TO HCC 42A REPORT AND EVIDENCE**

- 7.1 I have reviewed the Section 42A Report, and the evidence of Ms Caddigan and Ms Galt. The Section 42A Report is generic and serves its purpose of setting out the general themes and issues arising from submissions and further submissions to the built heritage components of PC9. As such, I do not comment further on it, other than to say that it correctly notes the concerns many submitters expressed about the

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<sup>14</sup> PC9, section 32 Assessment, Appendix 8: Built Heritage Methodology Report and Inventories: Hamilton City Council Heritage Inventory Report (2 June 2022), Appendix A, section 3.1(a), page 7.

heritage building assessment methodology. I also observe that the particular circumstances and issues associated with the Station do not neatly fit into any of the more generic themes identified in the Section 42A Report.

- 7.2 I note that the evidence of Ms Caddigan and Ms Galt address methodology/planning framework, rather than the scheduling of the Station specifically, which is to be considered at a subsequent hearing.
- 7.3 Ms Caddigan's evidence is in the expert field of built heritage. That specific field is outside my scope of expertise, thus I do not comment further on Ms Caddigan's evidence, other than to note that the methodology used to assess heritage buildings in the development of PC9 has been addressed by Mr Wild and Ms Cassin, who have identified a number of shortcomings regarding its appropriateness and rigour.
- 7.4 Ensuring that the methodology used to identify the significance of additional heritage buildings in Schedule 8A is robust, and that all relevant information has been gathered and interpreted appropriately, is crucial to ensure PC9 (and the proposed scheduling of the station building) gives effect to Objective 19.2.3 which limits the protection of heritage values to *significant* buildings. At the time of preparing this evidence, the methodology used to assess significance is highly contested, and as result my view is that there is no certainty that scheduling the buildings that have been identified by that methodology is the most appropriate way to achieve the objective. I note that Ms Galt supports the amendment of Policy 19.2.3a by PC9 to the effect that it would now require avoidance of the demolition of "B" ranked buildings as well as "A" ranked buildings, except where specific matters can be demonstrated to be met. In my view it is appropriate for Policy 19.2.3a to continue to apply to "A" ranked buildings, given that an "A" ranked building needs to have been assessed as having outstanding or high value under one or more of the assessment criteria.
- 7.5 "B" ranked buildings on the other hand need only have been assessed as having significant heritage values of 'high' or 'moderate' value in one of the assessment criteria. Notwithstanding the effect of section 6(f) of the RMA, it does not seem to me to be a proportionate policy response to subject a building that might be scheduled on the basis of

scoring moderately in just one criterion to the same demolition avoidance considerations of Policy 19.2.3a that would apply to much higher scoring buildings.

## **8 CONCLUDING COMMENTS**

- 8.1 The proposed decision to schedule the Station as a Category “B” ranked building in the Operative District Plan has been made on the basis of inadequate heritage assessment information, and in the absence of important information as to the level of cultural and economic effects that the scheduling would generate.
- 8.2 In my opinion, the proposed scheduling of the Station does not outweigh the need for the Site to evolve as a fit for purpose operational emergency service (policing) facility, or the need for the Crown to be able to uphold its Te Tiriti o Waitangi settlement-derived responsibilities, should NZ Police elect to vacate the Site as planned.
- 8.3 Allied to the above, scheduling the Station would not recognise and provide for the relationship between Waikato-Tainui and their ancestral land that the Station occupies, as required by section 6(e) of the RMA. Having regard to the efficiency and effectiveness requirements of section 32, I do not consider that scheduling of the Station is the most appropriate way of meeting the objectives of PC9 or of the Operative District Plan more generally.
- 8.4 As a result, my view is that the appropriate planning decision to make with regard to the Station is to accept the relief sought by NZ Police and TGH, and delete the Station from Schedule 8A of PC9.

**Grant Eccles**

**22 September 2023**

## Appendix A

### Relevant NPS-UD provisions

**Objective 1:** New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

**Objective 3:** Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) the area is in or near a centre zone or other area with many employment opportunities
- (b) the area is well-serviced by existing or planned public transport
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

**Objective 4:** New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

**Objective 5:** Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

**Policy 3:** In relation to tier 1 urban environments, regional policy statements and district plans enable:

- (a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and

**Policy 9:** Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:

- (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and
- (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and
- (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and
- (d) operate in a way that is consistent with iwi participation legislation.

### Relevant WRPS provisions

#### IM-O1 – Integrated management

Natural and physical resources are managed in a way that recognises:

1. the inter-relationships within and values of water body catchments, riparian areas and wetlands, the coastal environment, the Hauraki Gulf and the Waikato River;



2. natural processes that inherently occur without human management or interference;
3. the complex interactions between air, water, land and all living things;
4. the needs of current and future generations;
5. the relationships between environmental, social, economic and cultural wellbeing;
6. the need to work with agencies, landowners, resource users and communities; and
7. the interrelationship of natural resources with the [built environment](#).

### **IM-O7 – Relationship of tangata whenua with the environment**

The relationship of [tangata whenua](#) with the environment is recognised and provided for, including:

1. the use and enjoyment of [natural and physical resources](#) in accordance with [tikanga](#) Māori, including [mātauranga Māori](#); and
2. the role of [tangata whenua](#) as [kaitiaki](#).

### **IM-O8 – Sustainable and efficient use of resources**

3. Use and development of [natural and physical resources](#), excluding [minerals](#), occurs in a way and at a rate that is sustainable, and where the use and development of all [natural and physical resources](#) is efficient and minimises the generation of waste.

## **HCV – Historical and cultural values**

### **Objectives**

#### **HCV-O1 – Historic and cultural heritage**

Sites, [structures](#), landscapes, areas or places of [historic and cultural heritage](#) are protected, maintained or enhanced in order to retain the identity and integrity of the Waikato region's and New Zealand's history and culture.

### **Policies**

#### **HCV-P1 – Managing historic and cultural heritage**

Provide for the collaborative, consistent and integrated management of [historic and cultural heritage](#) resources. Improve understanding, information sharing and cooperative planning to manage or protect heritage resources across the region.

#### **HCV-P2 – Relationship of Māori to taonga**

Recognise and provide for the relationship of [tangata whenua](#) and their culture and traditions with their ancestral lands, water, sites, [wāhi tapu](#) and other [taonga](#).

#### **HCV-P3 – Effects of development on historic and cultural heritage**

Manage subdivision, use and development to give recognition to [historic and cultural heritage](#) and to integrate it with development where appropriate.

#### **HCV-M3 – Identification and assessment**

The Regional Heritage Inventory shall identify known sites, [structures](#), areas, landscapes or places of historic or cultural heritage that require protection from inappropriate subdivision, use and development for inclusion in relevant regional or district plans. In doing so regard shall be had to the Heritage New Zealand register of historic places, historic areas and [wāhi tapu](#) areas. The criteria provided in [APP7](#) shall form the basis of any new assessment of [historic and cultural heritage](#).

### **APP7 – Historic and cultural heritage assessment criteria**

When assessing [historic and cultural heritage](#), regard shall be given to the Heritage New Zealand register of historic places, historic areas and [wāhi tapu](#) areas and the following:

**Table 29 – [Historic and cultural heritage](#) assessment criteria**

<b>Archaeological qualities</b>	
<b>Information</b>	The potential of the place or area to define or expand knowledge of earlier human occupation, activities or events through investigation using archaeological methods.
<b>Research</b>	The potential of the place or area to provide evidence to address archaeological research questions.
<b>Recognition or Protection</b>	The place or area is registered by Heritage New Zealand 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 Heritage New Zealand Pouhere Taonga Act 2014.
<b>Architectural Qualities</b>	
<b>Style or type</b>	The style of the building or <a href="#">structure</a> is representative of a significant development period in the region or the nation. The building or <a href="#">structure</a> is associated with a significant activity (for example institutional, industrial, commercial or transportation).
<b>Design</b>	The building or <a href="#">structure</a> 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.
<b>Construction</b>	The building or <a href="#">structure</a> 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.
<b>Designer or Builder</b>	The building or <a href="#">structure</a> 's architect, designer, engineer or builder was a notable practitioner or made a significant contribution to the region or nation.
<b>Cultural Qualities</b>	

<b>Sentiment</b>	The place or area is important as a focus of spiritual, political, national or other cultural sentiment.
<b>Identity</b>	The place or area is a context for community identity or sense of place, and provides evidence of cultural or historical continuity.
<b>Amenity or Education</b>	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.
<b>Historic Qualities</b>	
<b>Associative Value</b>	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 Waikato or the nation.
<b>Historical Pattern</b>	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.
<b>Scientific Qualities</b>	
<b>Information</b>	The potential for the place or area to contribute information about an historic figure, event, phase or activity.
<b>Potential – Scientific Research</b>	The degree to which the place or area may contribute further information and the importance of the data involved, its rarity, quality or representativeness.
<b>Technological Qualities</b>	

<b>Technical Achievement</b>	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.
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