



Section 35 Evaluation Report

Outstanding Natural Features and Landscapes, Natural Character & Historic Heritage

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LIST OF ABBREVIATED TERMS

Abbreviations	Full Term
RMA	Resource Management Act
RPS	Regional Policy Statement
RP	Regional Plan
RCP	Regional Coastal Plan
ONFL	Outstanding Natural Features and Landscapes
TA	Territorial Authority

Executive Summary

Section 35 of the Resource Management Act 1991 (RMA) requires Horizons Regional Council to monitor and evaluate the effectiveness and efficiency of the provisions in the Regional Policy Statement (RPS), Regional Plan (RP), and Regional Coastal Plan (RCP). This report is a section 35 evaluation of the following topics:

- Outstanding natural features and landscapes (ONFL)
- Natural character
- Historic heritage

The objective of this evaluation is to assess the provisions that have made up these three topics and to display whether or not they have been implemented in a way that achieves intended outcomes. The effectiveness portion of this evaluation assesses if the Anticipated Environmental Results (AERs) which are linked to the relevant provisions have been achieved and through the timeframes that were set. It also assesses to what level have methods been implemented and how have the rules relating to specific policies contributed to the regulatory process. The efficiency portion of this evaluation seeks to assess where there may or may not be inefficiencies in implementing the provisions through cost. The evaluation also seeks to demonstrate that the requirements of national level direction are being implemented.

Overall, the One Plan does give effect to national level direction. The provisions of the One Plan give effect to provisions in legislation such as from the Resource Management Act 1991 and the Heritage New Zealand Pouhere Taonga Act 2014. There are short falls where the Plan does not fully encompass certain policies of the New Zealand Coastal Policy Statement, largely because methods in Chapter 8 have not been implemented.

From an effectiveness point of view, the plan provisions are partially effective. ONFL provisions in chapter 6 and chapter 8 of the One Plan have been partially implemented. The provisions that have not been implemented relate to proactive and further information gathering of ONFLs and particularly of information on coastal ONFLs. There is a significant gap in the policy framework where despite specific policy support in the RCP, coastal ONFLs are not protected to the fullest extent. Only one of the two AERs that are relevant to ONFL provisions has been achieved. The indicators used to assess this are questionable in their value as assessment tools and there are significant gaps in information for certain indicators. The provisions that direct Territorial Authorities (TA's) in protecting identified ONFLs have been implemented. Protection of coastal ONFLs has not been implemented.

Natural character provisions have also been partially effective. There are no AERs for natural character provisions and therefore the assessment must be measured differently. Certain methods that relate to natural character have been implemented and others have not been fully implemented but the outcomes have been achieved through other means. There are significant gaps in natural character information in the coastal environment which inhibits assessment of effectiveness of provisions. Natural character values are present in a number of RP rules and evidence displays that consenting decisions have taken natural character values into consideration. With only limited information, partial effectiveness is the overall outcome that can be made.

Historic heritage provisions have been partially effective. Protection of historic heritage is largely directed to the TAs and the findings of this report have assessed that district plans are largely sufficient and appropriate in their protection of historic heritage. This achieves the first part of the AER. TA's have extensive lists of historic heritage contained in each district which largely encompasses the Heritage NZ historic heritage list. However, the heritage provisions in the RPS have not been implemented in the RCP. Method 6-10 and 8-4 have not been implemented, as they are not considered a priority to resource. There are extensive rule conditions in the RP and the RCP

which apply adequate protections for historic heritage but there is a gap in where this applies in the CMA. A specific known site of historic heritage has not been identified in the RCP which means the AER has not been fully achieved and the protections for that site do not apply.

In terms of efficiency, there is insufficient information to conclude whether or not the provisions have been efficient. Firstly, much of the protections under this topic are directed towards the TA's to manage which means Horizons does not incur those costs. Secondly, assessing the cost of implementing methods can only take place if those methods have been implemented. With such a large number of methods not having been implemented or implemented in the way they were intended, measuring costs becomes difficult and given this is a desktop evaluation, there is no clear or accessible way of reliably measuring efficiency.

1. Introduction

The Resource Management Act 1991 (RMA) requires the Manawatū-Whanganui Regional Council (Horizons) to have a Regional Policy Statement (RPS), a Regional Plan (RP), and a Regional Coastal Plan (RCP) in order to outline how it will manage the natural and physical resources within the region alongside Territorial Authorities (TA's), tangata whenua and the community. Horizons has the One Plan which encompasses these three documents. The One Plan was notified in 2007 and has been operative since 2014. The RMA also requires Horizons to evaluate the effectiveness and efficiency of these plans and the policy statement in accordance with section 35 of the RMA, and to meet the requirements described in National Policy Statements and National Environmental Standards.

Section 6 of the RMA requires recognition and protection of outstanding natural features and landscapes, natural character and historic heritage as matters of national importance. The One Plan includes a range of provisions and supporting text throughout to protect outstanding natural features and landscapes, and historic heritage (including sites of significance to Māori such as wāhi tapu) from inappropriate subdivision, use and development. These provisions are primarily contained in Chapter 6 of the One Plan.

2. Purpose of this report

The purpose of this evaluation is to report on the effectiveness and efficiency of the One Plan provisions that manage protection of outstanding natural features and landscapes (ONFL), natural character, and historic heritage. These three topics are managed through multiple provisions which cross over between several chapters of the One Plan that are identified within the [evaluation scope](#) of this report. This evaluation has been initiated to ensure Horizons is meeting its statutory obligations under Section 35 of the RMA. There is a significant amount of crossover where methods seek to implement multiple policies for different topics. In this case, the evaluation in this report will assess these provisions but will only focus on the parts which relate to ONFL, natural character or historic heritage, and will assess those provisions through the lens of those topics.

In general, an evaluation provides an essential check on the practicability of objectives, and the capacity for stated methods and targets to be achieved subject to resourcing levels, budget constraints and other circumstances. In this case, the evaluation will also guide future plan changes.

3. Statutory context

3.1 Resource Management Act 1991

The RMA provides a well-established framework for evaluation, monitoring and review of an RPS, RP and RCP. As set out in s35(2)(b) of the RMA, every local authority is required to monitor the effectiveness of the policies, rules and methods in its plan, and to prepare a report on the results of this monitoring every five years as per s35(2)(a). Monitoring the efficiency and effectiveness of policies, rules and other methods is an ongoing process from plan implementation to plan review. Plan monitoring closes the loop in the 'plan-do-monitor-review' cycle; such monitoring provides information on how well the One Plan is working 'on the ground', and helps determine whether changes to the One Plan need to be made if the objectives and anticipated environmental results have not been achieved.

Section 6 of the RMA highlights the protection and preservation of outstanding natural features and character alongside historic heritage as matters of national importance. S6 requires Horizons and all TAs who operate under the RMA to recognise and provide for the protection of these matters from inappropriate subdivision, use, and development.

Section 12 of the RMA restricts destruction, damage or disturbance of any foreshore or sea bed in a manner that is likely to have an adverse effect on historic heritage unless allowed for by a rule in the RCP.

Section 58 of the RMA sets out the contents of the New Zealand Coastal Policy Statement. The section calls for the preservation of natural character in the coastal environment.

Section 199 of the RMA also recognises outstanding amenity or intrinsic values which are afforded by waters in their natural state.

Further, under s79 of the RMA, regional councils must commence a review of any provision of a regional policy statement or regional plan, if the provision has not been a subject of a proposed policy statement or plan, a review, or a change by the local authority during the previous 10 years. The historic heritage and outstanding natural features and landscapes provisions have not been reviewed since the One Plan was made fully operative in December 2014, therefore a review of these provisions should commence by December 2024.

3.2 Heritage New Zealand Pouhere Taonga Act 2014

The Heritage New Zealand Pouhere Taonga Act 2014 (HNZ Act) seeks to promote the identification, protection, preservation, and conservation of historic heritage. This Act repealed the Historic Places Act 1993 which was the former piece of heritage protection legislation prior to this Act. The Heritage New Zealand Pouhere Taonga Act 2014 was written to better strengthen and streamline the archaeological and cultural heritage provisions. It also was written to better align heritage provisions with the RMA.

The HNZ Act established the HNZ Board and retained the Māori Heritage Council. These bodies are responsible for supplying and maintaining the New Zealand Heritage List. The List identifies and records places or areas of historical significance, wāhi tapu and wāhi tūpuna. Registration is merely an acknowledgement that the site is worth protection. Local authorities are required to have regard to the List when preparing their plans and / or policy statements; but the protection of historic places, areas, wāhi tapu and wāhi tūpuna depends entirely on the provisions of each district plan.

Heritage New Zealand has greater powers in relation to the protection of archaeological sites. The HNZ Act makes it unlawful for any person to modify or destroy, or cause to be modified or destroyed, the whole or any part of an archaeological site without the prior authority of Heritage New Zealand. (J. Gregory, 2015)

The Heritage New Zealand Pouhere Taonga Act 2014 is relevant primarily to the heritage portion of this report.

3.3 Reserves Act 1977

The Reserves Act 1977 is a piece of legislation which sets out to protect and manage public areas and ensure that areas continue to provide amenity scenic value and special features recreational use, among other functions. It holds directive policy for the categorisation and protection of natural features and landscapes, natural character and historic heritage. The general purpose of the Act

includes ensuring the preservation of the natural character of the coastal environment, especially for unnecessary subdivision and development. Regional Councils must provide for this in the provisions of the RPS, RP and RCP. The Reserves Act 1977 is a factor which contributed to the development of the current provisions and is relevant for the natural character and ONFL portion of this evaluation.

3.4 Conservation Act 1987

The Conservation Act 1987 is another piece of legislation with the broad purpose of protecting natural and historic resources. The Act also sets up the Department of Conservation which multiple Methods in the One Plan require collaboration with. The Conservation Act is supported by other pieces of legislation and links to the RMA, the Heritage New Zealand Pouhere Taonga Act 2014, the Reserves Act 1977 and more. These Acts all contribute to the wider management of the natural and built environment. The Conservation Act 1987 specifically relates to the natural character and outstanding natural features and landscapes portion of this report through its protection and management of natural resources.

3.5 National Policy Statements

New Zealand Coastal Policy Statement 2010

The New Zealand Coastal Policy Statement 2010 (NZCPS) is a national direction enactment which guides management of the coastal environment. There are five specific policies in the NZCPS which relate to the topic of this s35 report:

Policy 13 Preservation of natural character

This policy requires the protection of natural character in the coastal environment from inappropriate subdivision, use and development, including applying the protection hierarchy to avoid, remedy then mitigate other adverse effects of activities on coastal natural character. Part (c) of the policy directs Horizons to map or otherwise identify at least areas of high natural character in the coastal environment and that provisions be implemented into the plan to ensure protection.

Policy 14 Restoration of natural character

Promotes the restoration or rehabilitation of the natural character of the coastal environment through different means. This includes proactive identification of areas and opportunities for restoration or rehabilitation and it also includes providing provisions to enable restoration or rehabilitation.

Policy 15 Natural features and natural landscapes

This policy requires the protection of natural features and landscapes in the coastal environment through avoiding, remedying and mitigating adverse effects of activities. This includes protection from inappropriate development or subdivision. The NZCPS also requires Councils to identify and assess these sites within the region, recording the physical and ecological qualities of these areas. In addition, regional councils must ensure that their RPS, RP or RCP maps or otherwise identifies areas where the protection of natural features and landscapes requires objectives, policies and rules, and implement those provisions.

Policy 17 Historic heritage identification and assessment

Council has the primary responsibility for protecting historic heritage in the coastal marine environment from inappropriate subdivision, use and development. The NZCPS also requires the Council to identify, assess and record historic heritage including archaeological sites. The Policy requires Authorities to incorporate objectives, policies, methods and rules to protect historic heritage, including archaeological sites, in the coast. Policy 17 lists a number of functions that regional councils must consider and undertake to fully protect historic heritage in the coastal environment.

Policy 18 Public open space & Policy 19 Walking access

These policies recognise the public expectation of public space and walkable access along the coast. The policies highlight where authorities can identify current and potential spaces of public access. That these areas should be protected from activities and subdivision and enhancing these areas where practicable. This policy is relevant for certain provisions in Chapter 6 that manage public access which are within scope of this evaluation.

The NZCPS plays a fairly dominant role in guiding the development of the protections for the significant natural and cultural aspects of the coastal environment. It is important to note that the NZCPS came into force in December 2010, after the notification of the hearings panel on submissions for the Proposed One Plan which were notified in August of that year. The implications of these relative timings is discussed further in the Coastal s35 evaluation and also further in the methods sections of this report.

National Policy Statement for Freshwater Management 2020

The National Policy Statement for Freshwater Management (NPS-FM) includes a focus on outstanding natural features and landscapes and natural character as values that should shape limits and targets. Appendix 1B lists natural form and character as a value which must be considered. This evaluation is based on the 2020 version of the NPS-FM and considers the most current amendments out of scope.

Resource Management (National Environmental Standards for Freshwater) Regulations 2020

In addition to the NPS-FM, there is also a general condition in the National Environmental Standards for Freshwater (NES-F) which states that activities involving freshwater must not destroy, damage or modify a site of historic heritage that is protected by any primary or secondary legislation including National Policy Statements and National Environmental Standards. The provisions in these two pieces of secondary legislation will be addressed further by the Freshwater Plan Change currently being undertaken by Council. The NES-F was amended in 2022; these changes are being addressed through the upcoming Freshwater Plan change and therefore the amendments are out of scope for this evaluation. However, where there are gaps between the provisions and the amendments that are being identified and addressed elsewhere, this will be noted.

3.6 One Plan

One Plan RPS Chapter 10 (Administration) states that the Regional Council will regularly check the effectiveness of the policies and methods in this Plan in achieving the anticipated environmental results. This will be done every three years at the same time as reporting progress made by the

community in achieving community outcomes for the Region, being the Regional Council's Long-term Plan (LTP)¹.

Monitoring and reporting on the effectiveness of the One Plan will be based on the following process:

- a) *Evaluation of the Regional Council's Annual Reports and the policies and methods in this Plan to assess which policies and methods have been implemented,*
- b) *Evaluation of the LTCCP [sic] and Annual Reports to assess actual work done to implement this Plan compared to the intended level of work each year, including consent, compliance and environmental incident response activity,*
- c) *Evaluation of the results of environmental monitoring carried out under the Regional Monitoring Strategy to assess the condition and trends of the Region's environment, with an emphasis on those parts of the environment where specific work has been done to make improvements, and*
- d) *Assessment of whether changes need to be made to policies and methods where there is slow or no progress toward achieving anticipated environmental results.*

Chapter 10 then continues that changes to the One Plan will be sought when:

- a) plan effectiveness monitoring identifies the need to enhance progress toward achieving anticipated environmental results, or
- b) major resource management developments arise such as significant amendments to the RMA or the adoption of national policy statements or national environmental standards by Government that have major implications for the contents of this Plan, or
- c) the results of new scientific work enhance this Plan and make plan provisions more certain for resource users.

¹ Chapter 10 refers to the Regional Council's Long-Term Council Community Plan (LTCCP).

4. Evaluation scope

The scope of the evaluation is limited to Chapters within the One Plan that relate to outstanding natural features and landscapes, and historic heritage. The provisions subject to evaluation are outlined in Table 1 below:

One Plan Chapter to be evaluated:	Specific provisions subject to evaluate	Comment
- Chapter 2: Te Ao Māori		Provisions in Chapter 2 have been evaluated in a separate evaluation however there are cross references to provisions between Chapter 2 and Chapter 6
- Chapter 6: Indigenous Biodiversity, Landscape and Historic Heritage	Objectives 6-2 and 6-3 Policies 6-6 to 6-10 Methods 6-7, 6-8, and 6-10 AER 6.3 & 6.4	Identification and protection of ONFL, natural character, and historic heritage from inappropriate subdivision, use and development.
- Chapter 8: Coast	Objective 8-2 Policy 8-1, 8-4 Method 8-4 AER 8.2	Coastal information and protection of identified sites from inappropriate subdivision, use and development.
- Chapter 14: Discharges to Land and Water	Rules 14-6, 14-7, 14-8, 14-10, 14-11, 14-15, 14-16, 14-18, 14-21, 14-22, 14-27 Rule 14-29	Specific rules with conditions setting a discharge boundary where activities cannot take place within 50m of a listed historic heritage site. Avoiding adverse effects on geomorphological components of the natural character of a waterbody
- Chapter 15: Discharges to Air	Rule 15-15	Condition on Flaring of Hydrocarbons- 100m activity separation distance from listed heritage sites.
- Chapter 16: Takes, Uses, and Diversions of Water, and Bores	Policy 16-3 Rule 16-7 Rule 16-11	Managing effects on Natural Character in consent decision making for diversions and drainage Condition on 'New Drainage' activity to any listed heritage sites.
- Chapter 17: Activities in Artificial Watercourses, Beds of Rivers and Lakes, and Damming	Rule 17-8	Condition on the controlled activity "replacement consents for existing damming of water"
- Chapter 18: Activities in the Coastal Marine Area (Regional Coastal Plan)	Provisions as they relate to chapter 6, particularly P18-2, P18-3, and P18-5 to P18-9. Rules 18-3, 18-11, 18-19, & 18-35	Historic heritage is highlighted as a value that applies to the entire CMA. An activity in the CMA is only considered permitted if it does not disturb any historic heritage identified in the Regional Coastal Plan. Natural Character is also a prominent factor in Policies in the RCP
- Schedule G	Table G.1	List of ONFL in the Region

Table 1: Specific One Plan Chapters to be evaluated under section 35 of the RMA.

5. Evaluation

To assist this s35 evaluation, the following set of questions have been developed to guide the structure of the s35 evaluations of the One Plan. These questions focus on effectiveness (have the provisions achieved what was intended and do they work?) and efficiency (have they been able to be implemented at reasonable cost?). The following questions have been used to guide the evaluation process:

<i>Effectiveness</i>	<i>Efficiency</i>
Are the Policies and Methods achieving the Objectives?	Are there additional costs/risks/time and resource implications created as a result of the provisions?
Are the Polices and Methods achieving the Anticipated Environmental Results?	Is the workload implicit in the policy manageable?
Is there evidence that the Policies and Methods are being used/applied in an effective way?	Are the regulatory, consenting and administrative transaction costs in line with what was anticipated?
Have the provisions been implemented as intended? Is the plan perceived to work, are the provisions enforceable?	

Table 2: Guiding questions

5.1 Overview of the relevant provisions

<p>Objective 6-2: Outstanding natural features and landscapes, and natural character</p>	<p>a) The characteristics of:</p> <ul style="list-style-type: none"> (i) The Region’s outstanding natural features and landscapes, including those identified in Schedule G, and (ii) The natural character of the coastal environment, <i>wetlands</i>[^], <i>rivers</i>[^] and <i>lakes</i>[^] and their margins. <p>are protected from inappropriate subdivision, use and development</p> <p>b) Adverse <i>effects</i>[^], including cumulative adverse <i>effects</i>[^], on the natural character of the coastal environment, <i>wetlands</i>[^], <i>rivers</i>[^] and <i>lakes</i>[^] and their margins, are:</p> <ul style="list-style-type: none"> (i) Avoided in areas with outstanding natural character, and (ii) Avoided where they would significantly diminish the attributes and qualities of areas that have high natural character, and (iii) Avoided, remedied or mitigated in other areas. <p>c) Promote the rehabilitation or restoration of the natural character of the coastal environment, <i>wetlands</i>[^], <i>rivers</i>[^], and <i>lakes</i>[^] and their margins.</p>
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Objective 6-2 seeks to protect the characteristics of Schedule G ONFL and specified natural character from inappropriate subdivision, use and develop. It establishes a hierarchy for managing adverse effects to these characteristics. It also promotes the rehabilitation or restoration of specified areas of natural character. This Objective gives effect to section 6 of the RMA which specifies the protection of these characteristics as a matter of national importance.

Objective 6-2 is supported by policies 6-6, 6-7, 6-8, 6-9 and 6-10.

<p>Policy 6-6: Regionally outstanding natural features and landscapes</p>	<p>The natural features and landscapes listed in Schedule G Table G.1 must be recognised as regionally outstanding and must be spatially defined in the review and development of district plans. All subdivision, use and development directly affecting these areas must be managed in a manner which:</p> <ul style="list-style-type: none"> a) avoids significant adverse cumulative <i>effects</i>[^] on the characteristics and values of those outstanding natural features and landscapes, and b) except as required under (a), avoids adverse <i>effects</i>[^] as far as reasonably practicable and, where avoidance is not reasonably practicable, remedies or mitigates adverse <i>effects</i>[^] on the characteristics and values of those outstanding natural features and landscapes.
<p>Policy 6-7: Assessing outstanding natural features and landscapes</p>	<p>The Regional Council and <i>Territorial Authorities</i>[^] must take into account but not be limited to the criteria in Table 6.1 when:</p> <ul style="list-style-type: none"> a) identifying outstanding natural features and landscapes, and consider whether the natural feature or landscape is conspicuous, eminent, remarkable or otherwise outstanding, and b) considering adding to, deleting from, or otherwise altering, redefining or modifying the list of outstanding natural features or landscapes listed in Table G.1 of Schedule G, or c) considering the inclusion of outstanding natural features or landscapes into any <i>district plan</i>[^], or

	<p>d) establishing the relevant values to be considered when assessing <i>effects</i>^ of an activity on:</p> <ul style="list-style-type: none"> (i) outstanding natural features and landscapes listed in Table G.1 of Schedule G, or any other outstanding natural feature or landscape. (ii) any other outstanding natural feature or landscape.
<p>Table 6.1 Natural Feature and Landscape Assessment Factors</p>	<p>See Appendix 1</p>
<p>Policy 6-8: Natural Character</p>	<ul style="list-style-type: none"> (a) The natural character of the coastal environment, <i>wetlands</i>^, <i>rivers</i>^ and <i>lakes</i>^ and their margins must be preserved and these areas must be protected from inappropriate subdivision, use and development. (b) The natural character of these areas must be restored and rehabilitated where this is appropriate and practicable. (c) Natural character of these areas may include such attributes and characteristics as: <ul style="list-style-type: none"> (i) Natural elements, processes and patterns; (ii) Biophysical, ecological, geological, geomorphological and morphological aspects; (iii) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; (iv) The natural movement of water and sediment including hydrological and fluvial processes; (v) The natural darkness of the night sky; (vi) Places or areas that are wild and scenic; (vii) A range of natural character from pristine to modified; and (viii) Experiential attributes, including the sounds and smell of the sea; and their content or setting
<p>Policy 6-9: Managing natural character</p>	<p>In relation to the natural character of:</p> <ul style="list-style-type: none"> a) the component of the coastal environment which is not <i>coastal marine area</i>^ (CMA), and b) <i>wetlands</i>^, <i>rivers</i>^ and <i>lakes</i>^ and their margins subdivision, use or development must generally (but without limitation) be considered appropriate if it: c) is compatible with the existing level of modification to the environment, d) has a functional necessity to be located in or near the component of the coastal environment which is not <i>coastal marine area</i>^ (CMA), <i>wetland</i>^, <i>river</i>^ or <i>lake</i>^ and no reasonably practicable alternative locations exist, e) is of an appropriate form, scale and design to be compatible with the existing landforms, geological features and vegetation, f) will not, by itself or in combination with <i>effects</i>^ of other activities, significantly disrupt natural processes or existing ecosystems, and g) will provide for the restoration and rehabilitation of natural character where that is appropriate and practicable.

<p>Policy 6-10: Public Access to and along rivers^ and lakes^ and their margins</p>	<p>a) Activities within or near <i>rivers^</i> and <i>lakes^</i> must be established and operated in a manner which readily provides for public access. Public access may be restricted only where necessary for safety, cultural or conservation purposes, or to ensure a level of security appropriate for activities authorised by a <i>resource consent^</i>.</p> <p>b) Public access for recreational purposes must recognise the need to protect <i>rare habitats*</i>, <i>threatened habitats*</i> and <i>at-risk habitats*</i>.</p> <p>c) Public access must recognise existing private <i>property*</i> rights.</p>
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<p>Objective 6-3: Historic heritage^</p>	<p>Protect <i>historic heritage^</i> from activities that would significantly reduce heritage qualities.</p>
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Objective 6-3 requires the protection of historic heritage within the region from activities which would cause adverse effects.

Objective 6-3 is supported by Policies 6-11 and 6-12.

<p>Policy 6-11: Historic Heritage^</p>	<p>The <i>Regional Coastal Plan^</i> and <i>district plans^</i> must, without limiting the responsibilities of local authorities to address <i>historic heritage^</i> under the RMA, include provisions to protect from inappropriate subdivision, use and development <i>historic heritage^</i> of national significance, which may include places of special or outstanding heritage value registered as Category 1 historic places, wāhi tapu, and wāhi tapu areas under the Historic Places Act 1993 and give due consideration to the implementation of a management framework for other places of historic heritage.</p>
<p>Policy 6-12: Historic heritage^ identification</p>	<p>a) <i>Territorial Authorities^</i> must develop and maintain a schedule of known <i>historic heritage^</i> for their district to be included in their <i>district plan^</i>.</p> <p>b) The Regional Council must develop and maintain a schedule of known <i>historic heritage^</i> for the <i>coastal marine area^</i> to be included in the <i>Regional Coastal Plan^</i>.</p> <p>c) <i>Historic heritage^</i> schedules must include a statement of the qualities that contribute to each <i>site*</i>.</p>

<p>Objective 8-2: Appropriate protection, use and development in the CMA</p>	<p>Managing the CMA as a public area that is fundamental to the social, economic and cultural wellbeing of the people in the Region, while ensuring that the characteristics and Values listed in Tables I.1, I.2 and I.3 of Schedule I and natural character are protected from inappropriate use and development.</p>
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Objective 8-2 seeks to protect the CMA from inappropriate, use and development. It lists natural character specifically as a matter which is to be protected.

Objective 8-2 is supported by Policy 8-1, 8-4, and 8-5.

<p>Policy 8-1: Integrated management of the coastal environment</p>	<p>Integrated management of the coastal environment must be sought, including through:</p> <ul style="list-style-type: none"> (a) provisions in this chapter and the provisions of the Regional Coastal Plan (Chapter 18 and Schedule I as well as Chapters 11, 12 and 19 and the relevant definitions in the Glossary), (b) provisions in other chapters of this Plan address water[^] quality, erodible land[^] (including the coastal foredune*), natural hazards[^], indigenous biological diversity[^], landscapes and natural character, air discharges[^], and infrastructure[^], energy and waste* (including hazardous substances*), (c) provisions in district plans[^] that identify the landward extent of the coastal environment, sustainably manage land[^] use activities and, where appropriate, avoid subdivisions or development in any existing or potential hazard risk area, protect coastal dunes and avoid sprawling subdivision along the coastal edge, and (d) joint initiatives where resource management issues arise and are not addressed within the existing management frameworks of the respective regional plans[^] and district plans[^].
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<p>Policy 8-4: Appropriate use and development</p>	<p>Any use or development in the CMA must:</p> <ul style="list-style-type: none"> (a) have a functional necessity to be located in the CMA, (b) facilitate restoration or rehabilitation of natural features where reasonably practicable, and (c) avoid, as far as reasonably practicable, any adverse effects[^] on the following important values: <ul style="list-style-type: none"> (i) any characteristic listed in Table I.1 in Schedule I: Part B for each Protection Activity Management Area (ii) elements and processes that contribute to the natural character and open space characteristics of the CMA (iii) the landscape and seascape elements that contribute to the natural character of the CMA (iv) areas of significant indigenous vegetation and significant habitats of indigenous fauna, and the maintenance of indigenous biological diversity[^] (v) the intrinsic values of ecosystems (vi) the natural integrity and functioning of physical processes (including recognition of sea level rise*) (vii) historic heritage[^]. <p>When avoidance is not reasonably practicable, the adverse effects[^] must be remedied or mitigated.</p>
<p>Policy 8-5: Public access</p>	<ul style="list-style-type: none"> (a) Activities in the CMA must be established and operated in a manner which readily provides for public access. Public access must be restricted only where necessary for commercial, safety, cultural or conservation purposes, or to ensure a level of security appropriate for activities authorised by a resource consent[^]. (b) Public access in the CMA for recreational purposes must be provided in a manner that protects bird habitat areas, estuarine plant communities and dune stability.

5.2 Effectiveness assessment

The effectiveness section of the report assesses the provisions in the RPS, RP, and RCP and whether the intention behind these provisions has been implemented effectively and efficiently. This section of the evaluation is broken into the three different topics; outstanding natural features and landscapes, natural character, and historic heritage.

5.2.1 Outstanding Natural Features and Landscapes

ONE PLAN: Chapter 6 linkages				
Objectives (RPS)	Supporting Policy Framework	Methods	Indicators	Anticipated Environmental Results
Objective 6-2: Outstanding natural features and landscapes, and natural character	6-6 Regionally outstanding natural features and landscapes 6-7 Assessing outstanding natural features and landscapes	Methods 6-7, 6-8 RCP Policies 18-2, 18-3, 18-5, 18-7, 18-8, 18-9 all reference Policy 6-6 Schedule G	<ul style="list-style-type: none"> Number of Schedule G outstanding landscapes and natural features where identified characteristics and values have been damaged Level of protection afforded to Schedule G outstanding landscapes and natural features in Territorial Authority district plans Ratio of successful Regional Council submissions versus total Regional Council submissions made on outstanding landscapes and natural features to Territorial Authority consent planning processes. 	Except for change because of natural processes, or change authorised by a resource consent, at 2017 the characteristics and values of all outstanding landscapes and natural features identified in the Region (Schedule G Table G.1) will be in the same or a better state as assessed prior to this Plan becoming operative.
Objective 8-2 : Appropriate Protection, use and development of the CMA	8-1 Integrated management of coastal environment 8-4 Appropriate use and development	Method 8-4	<ul style="list-style-type: none"> Number of Schedule G outstanding landscapes and natural features in the CMA where identified characteristics/values have been damaged 	Except for change because of natural processes, or as a result of activities organised by this Plan or a resource consent, by 2017 the characteristics/values of outstanding landscapes and natural features identified in the CMA (Schedule G) will be in the same state as (or better than) before this plan became operative.

Table 3 ONFL Policy Framework

ONFL in the One Plan is primarily protected through Chapter 6, parts of Chapter 8 and Schedule G. Chapter 6 establishes the policy framework and Schedule G holds the identified ONFLs and their characteristics/values. Chapter 8 establishes the policy framework for ONFL protection in the CMA. To have a clear understanding of what the plan provisions intended to protect, Table G.1 of Schedule G can be found in [Appendix 1](#).

To understand the full intent of the provisions that direct ONFL protection, it is important to work through the cascade of provisions and then assess if intent has been achieved through implementation.

Policies

Policy 6-6 of the RPS requires regionally outstanding features and landscapes identified in Schedule G of the One Plan be recognised and spatially defined in all district plans to give effect to the One Plan. All subdivision, use or development of “these areas” (as defined in the district plans) must be managed in a way which avoids affects to the characteristics and values which make those areas outstanding. It also establishes the hierarchy which avoids, remedies and mitigates activities where avoidance is not reasonably practicable. To date, six of the ten TA’s in the region have spatially defined and recognised the ONFL in Schedule G which are within their boundaries. These TA’s are Horowhenua District Council, Palmerston North City Council, Manawatū District Council, Rangitīkei District Council, Ruapehu District Council, and Taupō District Council. Tararua District Council have spatially identified the areas but have not recognised them as ONFL. Whanganui District Council are currently undergoing an ONFL plan change to give effect to Policy 6-6 which is yet to be notified. The remaining two TA’s (Stratford District Council and Waitomo District Council) do not have any ONFLs within the region.

Policies 18-2, 18-3, 18-5, 18-7, 18-8, & 18-9 all reference Policy 6-6 in the RCP. The Regional Council must have regard to “giving effect to the Regional Policy Statement, particularly all the objectives and policies of Chapters 2 and 8, Objective 3-1 and Policies 3-1, 3-2, 3-3, 3-6 and 3-7, Objective 6-2 and Policy 6-6 and any relevant policies in the NZCPS;” during consent decision-making for activities in the CMA. These policies provide further policy support to the RPS.

Despite this, there is a major gap in the policy support for ONFL protection in the RCP. The specific wording of Policy 6-6 requires only TA’s to spatially define and recognise the landscapes listed in Schedule G as regionally outstanding in their District Plans. The hierarchy of protection in Policy 6-6 only applies to those landscapes that are spatially identified, not applied to the landscapes in Schedule G. However, ONFL in the CMA are not spatially identified in district plans because that is the role of the RCP. The implication of this is when RCP policies say to have regard to Policy 6-6 and Policy 6-6 does not apply protections to any ONFL in Schedule not listed in district plans, those protections are technically not being given effect to.

The matter is further complicated where Cape Turnagain (one of the Schedule G ONFL) is listed in Schedule I as a Protection Activity Management Area. The RCP does not identify the other coastal landscapes from Schedule G in Schedule I. Except where specifically stated, the RCP largely protects only areas and features identified in Schedule I meaning that anything that is not identified in Schedule I is not fully protected. Furthermore, Cape Turnagain is only protected in a Protection Activity Management Area context and not an ONFL context therefore there is a serious gap in coastal ONFL protection.

Policy 6-7 establishes the base criteria and process for creating, reviewing and changing spatially identified ONFL in District Plans and also in Schedule G. The table identifies the assessment factors for assessing current and potential areas of ONFL. No mechanisms have been put in place to review the assessment factors for whether they continue to be fit for purpose. It is also important to note that several TAs notified plan changes incorporating ONFLs between notification of the One Plan and it becoming operative. Despite this, the provisions in those plan changes are consistent with the One Plan.

Policy 8-1 establishes the integrated management of the coastal environment and specifies in (b) that the RCP should address multiple resource topics including landscapes. ONFL or Schedule G are not specifically referenced. However, we know that coastal ONFL are to be protected through the RCP in accordance with Chapter 6.

Policy 8-4 sets out the values which must be considered when managing activities to ensure that the CMA is protected from inappropriate subdivision, use and development. Specifically highlighted is the facilitation and

rehabilitation of natural features where possible. Again, there is no specific reference to ONFL but the word does encompass ONFL in its intention. Policy 8-4 supports Policy 8-1 as well as the provisions in Chapter 6.

Methods and Rules

The methods are non-regulatory levers that Council have identified which give effect to the policies. The rules are the regulatory levers. The methods and rules work hand in hand to give effect to the intention of the policies in Chapter 6 and Chapter 8.

Method 6-7 directs Council to formally seek changes to district plans if necessary to ensure provisions are in place to provide an appropriate level of protection to natural features and landscapes. This is to ensure that the district plans are consistent with the level of protection intended in Policy 6-6. This method is measured by AER 6.4 which forms part of the discussion further down. This method has been implemented as far as practicable, the details of which are covered below.

Method 6-8 aims to set a methodology for assessment of natural features and landscapes agreed between the Regional Council and Territorial Authorities within one year of this Plan becoming operative. Setting out a collaborative approach to continue consistent landscape assessments in highlighted areas which have been identified in the method. This method has not been implemented because funding towards achieving the method target was not allocated (Horizons Regional Council, 2017).

Method 8-2 sets out to restore and enhance the natural character of the coastal environment in partnership with external groups through establishing a coastal care coordinator. There is a crossover in this method with both the Natural Character section of this evaluation and with the Coastal s35 evaluation. The findings of the coastal evaluation show that despite a coastal care coordinator role not being established, other parts of the method have been achieved. This method was written to implement Policies 8-1 and 8-4. The Coastal Section 35 evaluation indicates that Method 8-2 is considered partially implemented. It is unclear whether or not this has resulted in the rehabilitation or restoration of natural features to the extent that Policy 8-4 intends.

Method 8-4 seeks to improve the amount of coastal information held by the Regional Council. As it stands, there is currently very little information held about the ONFL in the region's coastal area. The exception to this rule is information held by Horowhenua District Council. HDC has done some work for ONFL and natural character of the coastal environment in their district. The intent of this method from an ONFL lens is to hold more information to be able to better protect those characteristics. From an ONFL lens, this method has not been implemented. There is insufficient information about the ONFL and no action has been taken as of yet to collect information or to develop a work plan to set up that work.

Rules

There are no specific rules in the RP or RCP which reference Schedule G or protection of the specific outstanding natural features and landscapes that are identified in Schedule G. Schedule G identifies both east and west coastlines as having ONFL characteristics and values and also highlights specific areas of the coastline: "particularly the Ākitio Shore Platform, Castlecliff to Nukumarū coastal cliffs, Foxtangi Dunes, Hokio Beach South Dune Fields and Santoft parabolic dunes". Of these, the Ākitio Shore Platform is the only identified area which is within the CMA. Being the case, the Ākitio Shore Platform should be included in Schedule I just as the Schedule identifies Cape Turnagain. However, this is not the case, Schedule I only identifies the Ākitio River and estuary not the shore platform. As relevant Schedule G ONFL have not been appropriately identified and supported by specific rules applying to them or by being identified in a Schedule I area, these characteristics are not properly protected.

AER 6.4

This Anticipated Environmental Result is the estimation of what the plan expects to achieve through the implementation of its methods and policies. Part of the AER are the indicators which signal if the result is what was anticipated. AER 6.4 reads: "Except for change because of natural processes, or change authorised by a resource consent, at 2017 the characteristics and values of all outstanding landscapes and natural features identified in the Region (Schedule G Table G.1) will be in the same or a better state as assessed prior to this Plan becoming operative."

The AER is assessed through three indicators:

Damage to Schedule G characteristics and values

The first indicator for AER 6.4 is the indicator which would best assess whether or not the provisions in the One Plan are being effective. The target of the indicator is to show the number of Schedule G ONFL where identified characteristics and values have been damaged. The AER lists ONFL assessment surveys, Regional Council Incidents database and the Regional Council's Subdivision Enquiry as sources of information to measure the indicator.

ONFL features characteristics and values assessment surveys

This data source was expected to provide information to assess the ONFL characteristics over multiple surveys, which could help describe the damage or change either through natural or non-natural means. A number of TA's have specific reports assessing the characteristics of ONFLs in each district. These are assessment surveys which provided the necessary evidence for spatial identification and recognition of ONFL, including mapping and provisions, in DPs. These reports provide the baseline state of the ONFLs in the region. However, to date, there have not been any further assessment surveys completed either by TA's or by the Regional Council. This is likely because of the low priority nature of the topic, combined with the large expense of these surveys. Therefore, this data source does not provide the information needed and does not contribute into measuring the success of the indicator. This data source would likely have been effective at providing useful and necessary information had it been implemented as intended.

Incidents Database

The AER also lists the Horizons Incidents database as a data source for measuring the first indicator. The Incidents database is a tool for recording any breaches to One Plan provisions that have been identified either by Council or through citizen complaints. The Incidents database has been included as a data source because it should provide information where incidents have taken place in a listed CMA ONFL because non-CMA ONFL is enforced by the TA's. Incidents recorded in the database are categorised into land, water and air incidents. Any incidents relating to ONFL would be recorded in either land, or water depending on the ONFL.

The incidents database does not provide any clear or largely usable information to help in this assessment. The practicality of the incidents database does not allow for access to the specific information required in this report. There is no clear way to isolate the desired information from the rest of the land/water incidents, and no feasible way of sorting the results to highlight the specific information needed. Furthermore, the incidents database only works if incidents are reported. If incidents have taken place, there is no guarantee that these breaches of consents or provisions have been logged. It is also important to note that many of the incidents recorded in the database are unverified. As such, the Incidents database as a data source and tool for indicating damage to ONFL characteristics is ineffective.

Regional Plan Consents

This data sources is intended to show how consent decisions apply protections to avoid granting consent to activities which have an adverse effect on the characteristics and values of listed ONFL. AER 6.4 states that damage must be avoided except for by natural processes or by authorisation from a resource consent. Therefore the provisions that allow for resource consents must be stringent to ensure appropriate protections while still allowing for key infrastructure or activities to take place in these areas where appropriate.

Regulatory protection of ONFLs is primarily delivered through district plans and district plan consents. However, over the life of the One Plan, there have been 30 consents granted by the Regional Council in relation to Policy 6-6 and 6-7. These consents are split between Land Use Consents and Discharge Permits. In all of the consenting decisions, adverse effects to the ONFL characteristics were found to be negligible resulting in the consent being granted. Likewise, a number of these consents such as Te Ahu a Turanga, He Ara Kotahi and Mercury Energy consents have been tested through the hearings process which provides more scrutiny on the provisions. In these examples, impacts to ONFL characteristics are more thoroughly examined and verified contributing to the granting of the consents. These cases suggest that the provisions in the One Plan are stringent enough to hold up through these processes. None of the consents are in the CMA therefore this is not a useful data source to assess the effectiveness of ONFL rules in the CMA.

As a tool for assessing the level of damage to ONFL characteristics, this data source provides the most information on potential damage to ONFL characteristics. The underlying assumption of this data source is that through the consenting decisions finding effects negligible, there has been minimal or acceptable impact to the characteristics of ONFL sites through granted activities. This is only in the case for the non-CMA listed consents.

Indicator results

From the limited information available, this indicator is largely unmeasurable. There is not enough information to show whether or not there has been any damage to ONFL characteristics outside of specific consents. We can see from the number of consents granted, that there are a number of activities which have occurred in listed ONFL. Through adequate and appropriate measures, the decisions on those consents have deemed those activities to have negligible impact to ONFL characteristics. What this source of information does not show, is what cumulative impact might have occurred. However, due to many of the activities largely being maintenance type activities, the assumption is that the cumulative effect is low if anything. This indicator would be useful and appropriate for measuring effectiveness if the information was available.

TA Protection

The second indicator for AER 6.4 is the level of protection that district plans provide for Schedule G ONFL listed sites. This indicator is a success measure for Policies 6-6 and 6-7. There are ten Territorial Authorities within the Regional Council's boundaries, three of which (Waitomo, Stratford and Taupō) are only partially located in the region. Stratford and Waitomo do not have any Schedule G listed areas within the region. Of the remaining eight, all but Tararua DC and Whanganui DC have appropriately incorporated the Schedule G ONFL areas within their District Plans as ONFL in conjunction with provisions for the protection of those identified areas. The strength of provisions varies in each plan but they are all fairly consistent in the strength of protection for identified and/or mapped ONFLs. The District Plans also include specific descriptions of location alongside the characteristics and qualities identify the ONFLs. The subsequent regulatory frameworks in these District Plans provide stringent protection from subdivision, use or development and manages the adverse effects of activities on the characteristics and values of the identified ONFL. Horizons has been largely satisfied with the protections developed in the District Plans². As evidence further in this AER assessment, Horizons has submitted in broad approval of parts of ONFL provisions in the District Plans and while also pursuing amendments via the appeals process on other parts of district ONFL provisions. This will be highlighted under a further indicator. Overall, Horizons has been generally satisfied with the outcome of the plan processes in giving effect to Policy 6-6 and 6-7.

The exception to this generalisation is the Tararua District Plan and the Whanganui District Plan. While the Tararua District Plan identifies the necessity to protect ONFL in the issues section of the Plan, it lacks subsequent provisions to put appropriate protections in place. The Plan recognises through section 6 of the RMA that protection of ONFL is considered a matter of national importance. It also recognises that the One Plan identifies several features and landscapes within the district which are considered 'outstanding' or 'regionally significant'. Appendix 3 of the Tararua DP lists natural features and landscapes including the Tararua Ranges and coastal sites such as Cape Turnagain which are Schedule G identified ONFL. All listed sites are classified Category B which means modification, damage or destruction are Discretionary activities. Where these provisions do not give effect to the One Plan is the identification.

² (Personal communication P.Tucker 2024)

The District Plan only identifies natural features and not 'outstanding' natural features. There is also a lack of provisions avoiding subdivision which would apply specifically for the non-coastline ONFL. While there are maps of these areas indicating consistency with Policy 6-6, the intent is not the same. In the case of Whanganui District Council, they are currently undergoing an ONFL plan change to make their ONFL provisions consistent with higher direction. These changes are still proposed but are not yet notified.

A further way of assessing this indicator is to assess the actual working of the District Plans. By looking at some examples of specific consent decisions on consent applications that affect ONFL areas, the strength of TA protection in action can show if there are gaps. Because this evaluation is a desktop study, there is limited capacity to assess the wide range of consenting decisions. Instead, this report will look at a couple of example cases and infer a wider result. The first example is consent decisions in the Rangitikei District. There have been five consent applications where Rangitikei District Council have identified that part of the application involves a mapped ONFL overlay from their Schedule C4 ONFL maps. In all of these consents, the provisions in the District Plan have come into effect deeming these applications as Discretionary activities. The decision reports for these applications go through the process of identifying the environmental effects that the applications propose alongside assessing the statutory obligations in regards to ONFL. All five applications were granted as Discretionary activities with conditions attached on the basis that the environmental effects of the activities were negligible. This example displays appropriate management and protection of mapped ONFL in the District Plan. The second example is the case of the Turitea Wind Farm (Ministry for the Environment, 2011) which had been consented but not constructed before Palmerston North City Council notified their PC 15B plan change. Included in the PC 15B the Tararua Ranges Landscape Protection Area (TRLPA) which the Turitea Wind Farm is located within. Through the appeals process in the Environment Court compromises were made to protect the TRLPA while still allowing for key energy infrastructure activities through policy support. In general, activities within the TRLPA unless specified by a rule in the District Plan are considered Non-Complying. In the case of the Turitea Wind Farm, the decision in the Environmental Court allowed for the consent on the part of the windfarm located within the TRLPA to remain at a Discretionary classification with conditions attached. This example shows that Palmerston North City Council also has sufficiently stringent provisions which have been tested through the Environment Court. A third example is the repowering of the Te Rere Hau wind farm also located along the Tararua ranges. The fast-tracked consent was granted mid 2023 after appropriate scrutiny through the Fast Track Expert Consenting Panel (Environment Protection Authority, 2023). Matters relating to ONFL characteristics were considered in the decision. These examples indicate that there is adequate protections in place in general across district plans because provisions and strength of provisions are similar across most district plans.

Indicator Results

Based on the above information, this desktop evaluation finds that TA's largely have consistent levels of protection in place for managing activities that affect ONFL characteristics. Through the examples of consenting and activity classifications displayed by both Palmerston North City and Rangitikei District Councils and assessing that the provisions in the remaining district plans are similar and consistent with these examples, it can be inferred that there is generally an appropriate level of protection given by TA's. Appropriate TA provisions indicate positive progress towards achieving AER 6.4.

Ratio of successful Submissions by Regional Council vs Total submissions by Regional Councils on ONFL TA plan changes.

The last indicator listed in the AER seeks to assess how many of the submissions made by Regional Council have been successful, as a measure of whether the provisions are sufficiently clear and directive to support the outcomes the Regional Council might seek through its submission. This indicator relates to Method 6-7 where it requires Council to formally seek changes to District Plans where necessary to ensure provisions in place provide the appropriate level of protection for ONFL characteristics and values.

Submissions Enquiry Database

The Submissions Enquiry Database (SED) is a data source which is supposed to display all of the submissions that the Regional Council has made to TA on ONFL related plans and plan changes. However, the SED is not an effective

measurement tool. The data contained within the database is extremely limited due to the functionality of the database and also primarily due to many of the submissions to TA's took place before the database became operational. This data source is not effective for measuring the indicator targets.

Because the SED is not sufficient for assessing the information required for this indicator, Table 4 below collates Horizons' submissions to District Plans and whether or not with the information is available, if the submissions have been successful in the decisions on submissions.

TA	Submission on PC	Decision on submission
Ruapehu	Operative 2013 –appeals in 2012	No changes were requested but informal communications between staff took place in pre-notification discussions. ³
Manawatū	PC65 (2020) Horizons submitted in broad support of the proposed plan change and that it is largely consistent with the One Plan. The submission requested changes to wording of specific policies and rules: NFL-P16, NFL-R2.	15 Submission points accepted, 2 accepted in part and 1 rejected. Overall, submission was largely successful.
Palmerston North	PC15B (2017) Windmills and Landscapes- Horizons submitted in support of Policy 7-1 and Map 9.1 which reflected RPS Policy 6-6 for the management of ONFLs. However submission was made that the full extent of the Provisions may not give full effect to the intent of Policy 6-6.	Decisions on this proposed plan change were appealed in the Environment Court by several energy industry submitters. Results from the environment court process include: Grandfathering discretionary classification of the consented but not yet built Turitea Windfarm located in the Tararua Ranges Landscape Protection Area. Adoption of a definition for repowering that ensured the evaluation of visual and landscape effects would be focused on the effects further than those already affecting the environment from existing windfarms.
Horowhenua	PC22 (2013) Horizons made a submission and then appeal decisions on the submission in relation to the definition of “ridges” and subsequently “hilltop” requiring amendment.	Result of appeal was successful. An annotated map incorporated with the term definitions being amended.
Whanganui	PC 48 (2022 current) ONFL specific provisions are being implemented into the Plan through this current Plan Review.	Submissions process is yet to take place.
Rangitikei	Proposed district plan 2010 General support for the ONFL provisions in the overall submission.	No changes were requested.
Tararua	Horizons have not had the opportunity to formally submit on any ONFL provisions captured within the TDC district Plan. Tararua provisions highlight ONFL protection in their significant issues but there are no rules in place. There are rules for natural features but not outstanding features. The skyline of the Tararua ranges is given Category B status which is the lower category protection despite being a One plan listed ONFL.	N/A We have provided informal communications with TDC on this issue. Note has also been made in at least one submission to TDC.

³ (Personal communications P.Tucker 2012)

Taupō	Horizons formally submitted a request to amend Plan change 42 citing the need to be consistent with Policy 6-6 of the One Plan in having ONFL mapped in the plan.	Requested amendments to map ONFL were accepted and incorporated into the notified plan.
Stratford	N/A	N/A
Waitomo	N/A	N/A

Table 4 ONFL District Plan Changes and Horizons submissions

Table 4 shows that the Regional Council has submitted on all plans and plan changes that involve ONFL provisions. In all cases Council has submitted, there has been broad support for provisions with minor changes which have been requested. Horizons has also been involved in pre-notification consultation and early informal discussions with TA's. As this is a desktop assessment, the access to information showing if decisions on Horizons submissions have been in favour of requested changes is limited. From the information available, the two submissions that we can see the decision outcome of, have success in the outcome of the submission. The HDC Plan Change was successful where Council requested changes to specific terms. The submission to MDC saw nearly all of the submission points accepted meaning the submission was overall successful. The decision on the submissions to the PNCC plan also escalated to the Environment Court. During the appeals process, appellants sought to have exceptions for definition changes and the specific grandfathering a discretionary classification for a consented but not yet built windfarm which was proposed within the TRLPA. While this was a different result than what Horizons requested in its submission, the decision created an appropriate compromise between the stringent TA provisions and key infrastructure requests. Of the remaining submissions, two of the District Plans submitted on were not ONFL specific Plan Changes and the submissions extended broad support for the ONFL provisions contained within. In these cases, no specific changes were requested by the Regional Council.

Indicator Result

From the results above, it can be said with some certainty that of the opportunities that Horizons has had to request changes where necessary on ONFL provisions, these submissions have been successful in the decisions process. Therefore this indicator shows positive progress toward achieving the AER. The use of the SED as a measurement tool has been ineffective for this indicator. This indicator may provide a positive indication however is not particularly valuable for assessing the effectiveness of provisions. The reasons behind this are captured in the Admin s35. The indicator is not readily measurable and it ignores the iterative nature of planning processes. A good outcome in a submission may not always come from a successful submission point. Therefore the number of successful submissions does not account for the qualitative results in the plan process.

AER Conclusions

The intent of AER 6.4 is to protect ONFL from inappropriate subdivision, use and development and to protect ONFL characteristics from damage. The indicators largely suggest that this intent is being achieved though through limited information. While the indicator of damage to ONFL characteristics is largely unmeasurable, the inference can be made on the basis of consenting decisions, that any damage which has occurred to ONFL characteristics through consented activity has undergone a thorough process assessing the impacts and in the cases where consents have been granted, those effects have been negligible. Through this, the assumption can be made that any damage to ONFL characteristics are appropriately being managed. The level of protection afforded by TA's is satisfactory through the consistency of provisions in the district plans and through the consenting decision examples. Tararua and Whanganui are the exceptions to this case in that their provisions are inconsistent with the One Plan. The final indicator was whether or not there has been a positive ratio of successful submissions on ONFL District Plan provisions. From the information available, there has been a positive ration where Horizons has submitted for changes to District Plans. With these three indicators showing positive progress towards achieving the AER, it can be said with

some certainty that despite gaps in information and measurability, the One Plan provisions have largely achieved the intent of AER 6.4 where we have assessed.

AER 8.2

“Except for change because of natural processes, or as a result of activities organised by this Plan or a resource consent, by 2017 the characteristics/values of outstanding landscapes and natural features identified in the CMA (Schedule G) will be in the same state as (or better than) before this plan became operative.”

This AER is the same as AER 6.4 except for the location it applies to which is the CMA. This AER is measured by assessing the number of Schedule G ONFL in the CMA where identified characteristics and values have been damaged. The sole indicator for this AER is the same indicator in Chapter 6: damage to ONFL characteristics from Schedule G identified ONFL in the CMA.

This AER cannot be properly assessed because there is a lack of information surrounding the Coast listed ONFL which include parts of the coastline; Ākitio Shore Platform, Castlecliff to Nukumarū coastal cliffs, Foxtangi Dunes, Hokio Beach South Dune Fields, Santoft parabolic dunes and Cape Turnagain.

Outside of these assumptions, there is no other way of measuring the indicator therefore this AER remains unmeasurable. In addition, the sites, located in the CMA have been listed in Schedule G, but are not mapped in Schedule I. This means that there is a gap in protection for these sites. For rules in Chapter 18 to apply, they must be mapped and identified within the Regional Coastal Plan. There is no monitoring of the CMA and there are no consents applications in these areas. Therefore there is no way for us to measure this.

5.2.1.1 ONFL Effectiveness Conclusions

- AER 6.4 has largely been achieved. The indicators suggest with the information available that there has been mostly positive progress towards achieving the AER. In achieving AER 6.4, the intent of the Chapter 6 provisions has been largely implemented. This assessment has identified that Method 6-7 has been implemented and achieved the intent of the Policies. Method 6-8 has not been implemented due to this method being largely unnecessary by the time the One Plan became operative. Policies 6-6 and 6-7 have both been implemented to achieve their intent.
- AER 8.2 cannot be measured. While there are examples of consideration of ONFL provisions in a handful of consent decisions, this is not substantial information to justify whether the AER has been achieved. Furthermore, Method 8-4 has not properly implemented in the context of ONFL information. This displays a lack of effectiveness in the provisions as the intent of the Policies and methods has not been fully realised.
- Through these results, the report demonstrates that ONFL provisions directed through Chapter 6 have been largely effective through the methods that have been implemented to achieve the AER. However, ONFL provisions through Chapter 8 have not been effective due to gaps in the RCP, missing information and unmeasurable AER indicators.
- There is a significant gap in management and protection of ONFL in the CMA. While the Policies in Chapter 18 do link the RCP to the intent of Policy 6-7, the gap occurs where the coastal specific ONFL are not identified in Schedule I and the RCP does not give the appropriate level of consideration or protection to those ONFL as a result. This gap coupled with coastal methods not being implemented to their full intent means that the intent of Policy 6-7 has not been fully realised.

5.2.2 Natural Character

Objectives (RPS)	Supporting Policy Framework	Methods/Rules
Objective 6-2: Outstanding natural features and landscapes, and natural character	6-8 Natural character 6-9 Managing natural character 6-10 Public access to and along rivers and lakes and their margins 8-5 Public Access Policy 18-2(d), 18-3(c) & (d), 18-5(c), 18-7(b) & (c), 18-8(d), 18-9(c) all reference public access	Methods 6-7 Rule 18-2, 18-3, 18-4, 18-11
Objective 5-4: Beds of rivers and lakes	5-22(e) General management of beds of rivers and lakes 5-24(b)(i) Activities in rivers or lakes and their beds with a Value of Flood Control and Drainage 5-25(a) Activities in rivers or lakes and their beds with other Schedule B Values 16-3(b) Consent decision-making for diversions and drainage	Method 5-11 Rules 14-29, 16-7, 17-8
Objective 8-2 : Appropriate protection, use and development of the CMA	8-1(b) Integrated management of the Coastal environment 8-4(c)(iii) Appropriate use and development	Method 8-4

Table 5 Natural character policy framework

Natural character is not defined in either the RMA or the One Plan but is listed in s6 Matters of Importance in the RMA. The accepted definition of natural character is taken from the Department of Conservation:

- The extent to which the natural elements, patterns and processes occur;
- The nature and extent of modification to the ecosystems and landscape/seascape;
- The degree of natural character is highest where there is least modification;

Policy 6-8 encompasses this guidance, though only for a water quality lens. The effect of different types of modification upon natural character varies with context and may be perceived differently by different parts of the community. Natural character is a subject in the One Plan which pans across multiple topics and which has also been covered to varying degrees in the Freshwater, Coastal and Indigenous Biological diversity Section 35 evaluations. It is also in scope for this evaluation because of the connection between natural character and outstanding natural features and landscapes, specifically terrestrial natural character aspects. The table below shows which aspects of natural character have been covered by the other evaluations:

Evaluation Topic	Provisions	Conclusions
Freshwater	Natural character where it relates to: -Wetlands as freshwater bodies -Natural character of rivers and lakes in Chapter 5 and corresponding RP chapters	-Monitoring results of wetlands indicates that the natural character of monitored wetlands have been protected from inappropriate use/development and adverse effects. The basis for this statement is that on the whole, monitored wetlands have experienced some improvement in their integrity. -Natural character of waterways and its geomorphological isn't specifically covered within the freshwater evaluation
Coast	Natural characteristics and intrinsic value of the CMA covered in Policy 8-4	Little to no information or data around natural character of the Coastal Environment.
Indigenous Biological Diversity	Natural character to where it relates to: -Biological diversity of wetlands (terrestrial lens)	The conclusions of this were inconclusive largely through unmeasurable AER indicators.

Table 6 Table of cross coverage

The aspects of natural character which are covered in other s35 evaluations are covered above. The aspects that are not covered is the natural character provisions of Chapter 6, and the natural character provisions of Chapter 5 where they specifically relate to the geomorphological components of streams, rivers and their beds. Therefore this part of the assessment will cover those gaps where applicable with the information available.

Policies

Policies 6-8 and 6-9 of the RPS are the directive Policies that address the management of natural character in terrestrial matters. Policy 6-10 establishes the guidelines for identifying and maintaining areas for public access.

The intent of **Policy 6-8** is to the natural character qualities in the coastal environment, wetland, rivers and lakes and their margins from inappropriate subdivisions, use or development and states that these areas of natural character must be restored and rehabilitated where appropriate and practicable. It should be read in conjunction with the Policies in Chapter 5 and 8. The policy outlines what sort of characteristics and attributes are to be protected including:

- natural processes and patterns
- biophysical, ecological, geomorphological, and morphological aspects
- natural landforms
- the natural movement of water
- the natural darkness of the sky
- places that are wild or scenic
- experiential attributes

Policy 6-9 describes the nature of appropriate activities in the listed areas. This includes factors such as necessity, compatibility with existing modifications, scale, effects, and whether or not measures will be taken to restore and rehabilitate natural character where appropriate and practicable. The intent of this policy is to ensure that the correct levers are in place to enable activity where appropriate while providing stringency in protections.

Policy 6-10 describes where public access can be appropriate and what factors must be considered where utilising areas of public access.

Policies 5-22, 5-24, and 5-25 are the directive RPS policies that provide for natural character in hydrological matters. The Policies identify managing effects on natural character in beds of rivers and lakes. This includes the

instream morphological components and natural processes of natural character. The intent of these policies is to ensure that the natural character of water bodies in all aspects are protected from adverse effects.

Policy 16-3 reinforces the Chapter 5 RPS provisions on natural character of water bodies. The intention behind this policy is to support implementation of Objective 5-3 and the Policies of Chapter 5 that the instream geomorphological components of natural character are provided for.

Policy 18-2, 18-3, 18-5, 18-6, 18-7, 18-8, and 18-9 in the RCP all include natural character as a factor in decision making where considering the adverse effects of an activity in the CMA. These Policies support Objective 8-2 and Policy 8-1 and 8-4 in the RPS to protect and provide for the natural character from inappropriate subdivision, use or development.

All of these relate to natural character but in different management environments. Natural character in Chapter 6 refers to mainly terrestrial natural character. In chapter 5, where it relates to freshwater. And in Chapter 8 and 18 where natural character is found in the CMA. All have the intent to protect the different types of natural character from adverse effects and from inappropriate subdivision, use or development.

Methods and Rules

Method 6-7 is the sole method in the RPS which is intended to implement both Policies 6-8 and 6-9. This method requires Council to formally seek changes to district plans if necessary to ensure that provisions are in place to provide appropriate protections to natural features and character.

Method 8-2 states that the Regional Council will work to restore and enhance the natural character of the coastal environment with key partners. This method implements policy 8-2 and while it is covered by the Coastal Section 35 evaluation it relates to natural character so is also included here in this evaluation from the natural character lens. According to the Coastal evaluation, this method has been partially implemented. However, while there is not a specific role as the method anticipates, the work to restore and enhance the natural character of the coastal environment is being carried out through other sub role aspects and community partners. This method is the sole method in Chapter 8 which specifically addresses natural character and through its implementation, this method crosses over with the Coastal Evaluation, the results of which state that this method has been partially achieved. Aspects of the Method have not been implemented, yet the intention behind it has been which supports the Policies the Method is implementing.

Method 5-11 directs Council to develop an approach for researching, monitoring and reporting on the natural character components of the rivers in the region. This method intends to assess changes in the natural character. This method has been partially implemented. The target to develop a specific research, monitoring and reporting programme has not been implemented, however, the work that would have taken place in this work programme is still being undertaken through other means. Assessment of natural character of rivers has been included in other science reports such as gravel and beds of rivers assessments. This provides some indication of aspects of the state of natural character in parts of the region, it is not the comprehensive state and trend monitoring programme envisaged by Method 5-11.

There are a number of rules within the RP which serve to protect different aspects of natural character from adverse effects of activities. These different aspects:

Rule 14-29	Condition ensuring that takes do not affect the geomorphological components of natural character of a waterbody.
Rule 16-7	Condition ensuring that takes do not affect the geomorphological components of natural character of a waterbody.
Rule 16-11	Condition ensuring that takes do not affect the geomorphological components of natural character of a waterbody.
Rule 17-8	Rule control is reserved over the geomorphological effects on the natural character of water bodies.
Rule 18-3	Control is reserved over adverse effects on natural character.
Rule 18-11	Discretion is reserved over adverse effects on natural character.

These rules ensure that consent decision makers have clear guidance on where and when natural character in the different environments must be protected from adverse effects. In each of these rules, avoiding adverse effects to natural character is a factor for reserving Control/Discretion on an activity.

Assessment

There is no specific AER attached to the natural character provisions. Therefore to assess the effectiveness of the policies and the methods and rules, this evaluation will assess how they may or may not achieve the intention of the Objective by highlighting three key components:

- Are the policies being considered in consent conditions?
- How is natural character addressed in the District Plans and what levels of protection are afforded to them?
- Have the Methods been implemented as intended?

Consents

Over the life span of the operative One Plan, there have been 21 consents permitted in association with Rules 6-8 and 6-9. The scope of this is limited to these two Policies as consents in relation to the other Policies in Chapters, 5, 8 and 18 are not largely in relation to natural character. Policy 6-8 and 6-9 are directly in relation to managing natural character. The 21 consents are split between Land Use Consents, Water Permits and Discharge Permits. There are no coastal consents within this search. There have been 11 consents granted in relation to rules 18-3 and 18-11. The consents do not specify whether it is the effects on natural character which are in consideration however, as control and discretion are reserved over adverse effects, it is worth noting them.

In the case of the 21 consents directly relating to Policies 6-8 and 6-9, it can be said that natural character is being considered at some level in consenting decisions. However, this level of certainty only applies to these 21 consents. The One Plan directs much of the terrestrial natural character management to TA's and therefore it is difficult to assess whether natural character is being properly consider and provided for in consenting matters. This level of information suggests that the provisions may be effective given there are consents that consider natural character provisions.

There have been 33 public access consents which are attributed to Policy 6-10 and 8-5 over the life of the One Plan. These consents relate to public access. These consents are largely land use consents to undertake works in and around areas of public access. There are a few air discharge permits as well. This data shows that consents have been granted permitting activities which have insignificant effects to public access and therefore shows that the intention of policies are being given effect to.

District Plans

The way in which TA's address natural character in the district plans will indicate the protection that terrestrial natural character throughout the region holds. All district plans recognise protection of natural character as a matter of national importance in compliance with s6 of the RMA. All district plans contain policies which protect natural character in all types from adverse effects and from inappropriate subdivision and use. These provisions impact activities and conditions on resource consent authorisations. The district plans are consistent with the strength of provisions in the One Plan. TA's incorporate natural character protection to a degree which is sufficient in meeting their obligations. With the information available, the TA's provide adequate consideration and appropriate protection for natural character which is consistent with the One Plan provisions. Upon this basis, it can be inferred that the One Plan provisions are effective and provide adequate consideration for natural character.

5.2.2.1 Natural Character Effectiveness Conclusions

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|---|
| <ul style="list-style-type: none"> • The regional resource consent data that is available suggests that appropriate consideration is being awarded to activities which affect identified components of natural character. Largely, consents have been granted only for activities which have negligible effects to natural character and public access suggesting the intent of the policies is given effect to through the consenting process. |
| <ul style="list-style-type: none"> • TA protection in the district plans is sufficient and appropriate where information is available. The provisions in the district plans recognise the national importance of protecting natural character. The provisions cascade to protect natural character components from adverse effects of activities such as inappropriate subdivision, use and development. The provisions in the district plans are all consistent with the provision in the One Plan. The provisions appear to effectively shape district plans. |
| <ul style="list-style-type: none"> • All of the methods in the RPS have been implemented, at least in part. Method 6-7 has been achieved through the Regional Council submitting on all district plans. Method 8-2 has been implemented in part as identified in the Coastal section 35 evaluation. Method 5-11 has partially been implemented. Some low priority work has taken place to assess natural character in rivers. There have also been reports on water related topics such as gravel which include in some small parts, natural character assessments. No specific research programmes have been implemented but the work of assessment is still loosely being carried out in other projects. The resulting evidence concludes that methods have been implemented in parts supporting that the methods are appropriately reflecting the intent of the Policies and Objectives. <u>This indicates that the provisions are largely effective.</u> |
| <ul style="list-style-type: none"> • Overall, the collection of evidence suggests that the natural character provisions in the One Plan are largely effective. The One Plan has directed Horizons to effectively consider and support natural character through TA management and through consenting decisions. |

5.2.3 Historic Heritage

ONE PLAN: chapter 6 linkages				
Objectives (RPS)	Supporting Policy Framework	Methods	Indicators	Anticipated Environmental Results
Objective 6-3: Historic heritage	Policies: 6-11 Historic heritage 6-12 Historic heritage identification 8-4(c)(vii) Appropriate use and development Policy 15-2(e) references heritage values RCP Policies 18-5(d), and 18-7(a), 18-8(a), and 18-9(a) which reference Policy 6-11	Method 6-10 Method 8-4 Rules 14-6, 14-7, 14-8, 14-9, 14-10, 14-11, 14-14, 14-15, 14-16, 14-18, 14-21, 14-22, 14-27, 15-15, 16-11, 18-3, 18-11, 18-19, 18-35 Schedule I	<ul style="list-style-type: none"> Level of protection from inappropriate subdivision, use and development afforded to scheduled historic heritage in territorial authority District Plans and the Regional Council Coastal Plan. Portion of Regional Council submissions accepted versus total Regional Council submissions made on historic heritage to Territorial Authority consent planning processes 	By 2017, the Region's known historic heritage will be recorded in district plans and the Regional Coastal Plan for protection from inappropriate subdivision, use and development.

Table 7 Historic heritage Policy Framework

Historic heritage in the One Plan is addressed predominantly in Chapter 6. Primarily through RPS Objective 6-3 and Policies 6-11 and 6-12. These are supported by Policy 8-4. There are non-regulatory methods in Chapters 2, 6 and 8. The One Plan uses the RMA definition of "historic heritage":

(a) means those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:

- (i) archaeological;
- (ii) architectural;
- (iii) cultural;
- (iv) historic;
- (v) scientific;
- (vi) technological; and

(b) includes—

- (i) historic sites, structures, places, and areas; and
- (ii) archaeological sites; and
- (iii) sites of significance to Māori, including wāhi tapu; and
- (iv) surroundings associated with the natural and physical resources

Policies

Policy 6-11 directs that there be specific protections set in the RCP and in the district plans for the protection of historic heritage from inappropriate subdivision, use and development. The intention of this policy seeks to protect historic heritage through rules in plans in conjunction with Policy 6-12 and 8-4.

Policies 18-5, 18-7, 18-8, & 18-9 all reference when making consenting decisions, the Regional Council must have regard to Policy 6-11. This displays a level of policy support in the RCP to the RPS through the consent decision-making process. In similarity, **Policy 15-2** also includes historic heritage as factor to have regard of during the

consent decision-making process in relation to discharges to air. These policies in the RP and RCP support the intent of the policies in the RPS.

Policy 6-12 directs the identification of historic heritage by district councils through lists and maps incorporated into their district plans. The Regional Council must also develop a RCP schedule for known historic heritage in the CMA. These schedules must include qualities which contribute to the historic value of each site. The intent behind this policy is to work in conjunction with Policy 6-11 where scheduled sites are protected by the provisions which are implemented to achieve Policy 6-11. The RCP has not given effect to this policy. This is discussed further in the context of the AER.

Policy 8-4 provides the same aim as Policy 6-11, requiring protection of historic heritage from inappropriate subdivision, use and develop but specifically in the CMA. The intent of this policy is the same as 6-11. To protect historic heritage in the CMA through implementation of rules and conditions which require avoidance of activities which have adverse effects and where avoidance is not reasonably practicable, remedied or mitigated.

Policy 2-2 is also an important policy in the wider scope of the topic. Policy 2-2 directs the RCP and district plans to identify wāhi tapu, wāhi tūpuna and other sites of significance for Māori. Wāhi tapu and wāhi tūpuna are captured in the RMA definition of historic heritage. The full assessment of this policy and its implementation will be covered in the Chapter 2 Evaluation report. The RCP contains particular wording in Policy 18-2, 18-3, 18-5, & 18-7 to 18-14 specifying that the RCP must have regard to multiple specified provisions including the policies of Chapter 2. However, there isn't any identification of specific sites or areas of wāhi tapu or wāhi tūpuna in the RCP. This demonstrates a further gap in protection of historic heritage in the RCP.

Methods and Rules

Method 6-10 aims to determine an approach for identifying historic heritage resources within the region. This identification would be specifically for sites not already listed in the district or regional plans and places emphasis on identifying areas which have a high potential for containing as of yet unidentified historic heritage sites and structures. This method has not been implemented. The resourcing was not allocated for this method to be implemented (Horizons Regional Council, 2017).

Method 8-4 provides a non-regulatory option for collecting further information on historic heritage in the CMA. Method 8-4 sets how the Regional Council should work in conjunction with the Department of Conservation to scope further collection and monitoring for a variety of coastal information types including historic heritage. This method is intended to give effect to Policy 8-4 through identification of historic heritage in the CMA which can then be protected through provisions. This method has not been implemented.

Rules

Rules in Chapter 14, Chapter 15, Chapter 16 and Chapter 18 provide support to the policies in the RPS. The specific rules are captured in the scoping table above. These rules have one of two purposes. They either apply conditions on activities ensuring those activities do not take place within a certain distance of a historic heritage site, or they apply a control or discretion classification to an activity that impact historic heritage in an adverse way. These rules provide regulatory protection through the consenting pathway or where activities can be classed as permitted activities. In addition to this, there is a general condition on land and bed disturbance consents in the CMA requiring cessation of works if any archaeological sites are discovered along with a requirement to notify necessary authorities such as iwi, Horizons and Heritage NZ Pouhere Taonga. There have been four notifications of an archaeological discovery over the last ten years. This general condition applies to the entirety of the CMA and gives effect to Policy 8-4. The general condition states that "The activity must not disturb any historic heritage identified in the Regional Coastal Plan". As sites of significant to Māori, including wāhi tapu, are considered historic heritage (as defined by the RMA), these rules and conditions also give effect to the provisions in Chapter 2 where they apply to wāhi tapu and wāhi tūpuna sites. Several rules in the RCP provide protection to historic heritage value identified in Schedule I. However, Schedule I does not identify historic heritage to the level of detail envisaged by Policy 6-12.

AER 6.3

The historic heritage AER in Table 6.6 is intended to provide the indicators of successfully implementing the policies and provisions for historic heritage in the RPS. The AER is formed in two parts which reflect Policy 6-11, 6-12 and 8-4. Sites of known historic heritage must be recorded in both district plans and the RCP. Adequate protections must be implemented to avoid inappropriate land use such as subdivision, use or development. To assess whether this AER has been achieved, this section of the report will come in two parts. Firstly will be a comprehensive table displaying known historic heritage sites sourced from Heritage NZ Pouhere Taonga cross referenced with listed sites in each of the district plans. Secondly an assessment of gaps between the two sources alongside an assessment of gaps in protection to any sites listed in district plans.

The list of sites below indicates the implementation of method 6-10 and 8-4. The identification of historic heritage in the region. The Heritage NZ database (Heritage New Zealand Pouhere Taonga, n.d.) is an extensive list of sites both historic, archaeologically significant and also culturally significant such as wāhi tapu sites.

List of Heritage sites by TA:

TA	District plan heritage sites	Heritage NZ no. of sites	Analysis
Horizons Regional Council	0	1	Heritage NZ identifies the wreck of the Hyderabad as the only piece of heritage in the CMA across our region. It is not listed in Schedule I of the RCP nor specified in any provision in chapter 18.
Horowhenua District Council	55	44	<p>Horowhenua District Council house their list of heritage sites in Schedule 2 of the District Plan. There are 55 buildings, structures and sites listed as heritage sites within the schedule including the site for the wreck of the Hyderabad and the Foxton Moa Hunter Midden. The strength of heritage protection for these sites is based on which category the site is listed as. The District Plan identifies 3 categories; Class A, B, and C. Class A sites have values at international and national levels. Class B have values at regional and local levels. Class C have a few heritage values but have been in some way compromised such as relocation, extensive modification, or significant components removed.</p> <p>The breakdown of the rule classes are as follows. Minor works and maintenance is permitted over all classes. Alterations and additions are permitted for Class C but are restricted discretionary for Class B and are non-complying for Class A sites. Demolitions, partial demolition or relocation are classified as controlled for Class C, discretionary for Class B Class A, and non-complying for Class A buildings that have a conservation plan.</p>
Palmerston North City Council	96	49	Palmerston North City Council list 96 different sites of cultural heritage in their district plan. While this is more than the 49 sites listed on the Heritage NZ list, there are 5 sites which are not identified in the District Plan. These 5 sites include 3 houses on Ranfurly St (numbers 40, 42, and 44), Colombo Hall located at the Massey University Campus, and the Awapuni Medical Corps Memorial. The District Plan schedule of listed sites is split into Categories 1 and 2. Rules are applied at different levels for each of the categories. For instance, external alteration and addition to category 2 heritage buildings in the residential zone are considered controlled activities whereas category 1 and 2 outside of residential zones are considered restricted discretionary. Maintenance and repair of heritage sites are listed as permitted activities which is consistent with all other councils. Excavation, partial demolition or full destruction of scheduled sites are considered discretionary.
Manawatu District Council	126	45	<p>Manawatu District Council (MDC) have two lists of heritage sites, one specifically for Category A and B heritage buildings in the Feilding township (Chapter 4) and the second being all sites elsewhere in the district (Appendix 1). MDC identified 42 buildings in Chapter 4 and 84 in Appendix 1. Only one Heritage NZ site is missing from the list; Hangar 2 and 3 (listed as one site) at the RNZAF Ohakea airbase. Despite this, MDC have identified and categorised many more sites in their list which signals a thorough methodology for identifying and categorising heritage sites.</p> <p>Rules relating to listed heritage sites utilise the different Categories A, B, & C. These categories prescribe how certain activities are classed in relation to each category. As a rule of thumb, Category C sites can be modified "as of right" however notice of activities such as building alterations or demolitions are required by council. Activities at Category B sites, specifically modification or demolition, require consent from the Council and Category A, the highest valued sites, have the highest level of protections. Modification of these sites is classed as discretionary activities which require consent and demolition of these sites are classified as non-complying activities. Maintenance or repair of sites in all categories are permitted activities.</p>

Whanganui District Council	419	86	<p>The Whanganui DP has a suite of policy provisions concerning protection and activity management of identified historic heritage sites and structures. Appendix A of the Whanganui District Council (WDC) District Plan lists all of the heritage items for the district. There are currently 419 items listed in the appendix. Of the 86 sites listed by Heritage NZ, there are a handful of sites not listed in the District Plan but these are mainly pits and other structures.</p> <p>The WDC District Plan lists Heritage Items in three classes; A, B, & C. In similarity to the other councils, these three classes allow certain activities to take place at different consent class levels. For all three classes, maintenance and repair of any listed sites are classified as permitted activities.</p>
Tararua District Council	62	53	<p>Tararua District Council lists 62 heritage structures in their District Plan and also a full list of archaeological/wāhi tapu sites in appendix 2. This extensive list contains all sites listed on Heritage New Zealand and more.</p> <p>Rules in the Tararua DP are consistent in their effect with the rules of the other TA's. Strength of rules are based upon the two categories that heritage sites are classed as: A & B. Minor repairs to either category are permitted activities. Modification of either category or removal, damage/destruction of Category B sites or where necessary for health and safety concerns of category A sites are Discretionary activities. And finally, any activity involving removal, damage, or destruction of Category A sites not specified in the other categories are Prohibited.</p>
Rangitikei District Council	61	64	<p>Schedule C3A lists all of the identified heritage items in the Rangitikei District alongside location. The DP has 61 listed heritage items. The three sites which do not make it into the historic heritage schedule of the DP are:</p> <ul style="list-style-type: none"> -Birch Homestead - Moawhango -Fallen Soldiers' Memorial - Bulls -Whitikaupeka Church - Moawhango <p>In terms of provision strength protecting listed heritage sites, activities for repair and maintenance are permitted, earthquake strengthening works are considered controlled and other activities which modify, change and or destroy which includes subdivision of sites listed in Schedule C3A.</p>
Ruapehu District Council	133	33	<p>The Ruapehu District Plan identifies 133 different heritage sites and buildings and includes all of the buildings listed by Heritage NZ. The provisions that go along with the scheduled sites provide adequate protections. Maintenance of buildings and sites listed in Appendix 4 are considered permitted activities. All other activities which have an effect on identified historic heritage sites including but not exclusively modifying, changing, destroying these sites are categorised between Restricted Discretionary, Discretionary, and Non-complying. These activities will be assessed against the DP Assessment criteria at the bottom of the heritage rules section.</p>
Stratford District Council	3	3	<p>The Stratford DP incorporates a chapter on heritage site identification and protection. The District Plan records the three sites which are located within the Horizons Region. The provisions within the District Plan provide adequate protections against subdivision and use of the three heritage sites. Subdivision on 'heritage resources' are held as discretionary activities. In addition, the damage removal, demolition, or destruction of a heritage resource is considered non-complying. Protections for heritage resources exclude any actions taken to repair or maintain the resource.</p>
Taupo District Council	N/A	0 within Horizons Region	No listed heritage sites with the Horizons Region
Waitomo District Council	N/A	0 within Horizons Region	No listed Heritage sites with the Horizons Region

Table 8 Identified historic heritage and TA provisions

The first indicator which measures the success of the AER is the identification of sites in the RCP and district plans. The table above shows how many of the New Zealand Heritage list has been captured in the plans. In most cases, district plans list more sites than are listed on the Heritage NZ database. This data source is effective in providing information to assess progress made towards the AER. The comprehensive list of historic heritage sites in the district plans indicates positive progress to achieving the first half of the AER because while there are a few gaps in sites captured, the scale of sites listed in district plans covers many more sites not listed by Heritage NZ. Some district plans have detailed information on wāhi tapu sites but generally this information is lower priority in the district plans.

The second part to this AER is that the listed heritage sites are protected from inappropriate subdivision, use, and development. Protections in the district plans and in the One Plan come from rules and the conditions imposed on activities in relation to effects on historic heritage. All of the district plans utilise a similar activity classification for activities within and around sites of historic heritage. All TAs categorise their historic heritage sites into different categories based upon their significance in a range of values. Some are afforded stronger protections than others. In most cases, the highest levels of protection class any activities outside of maintenance and repair as Discretionary, Non-complying and prohibited. Lower categorised sites have more lenient activity classes. All Councils have a consistent set of criteria for categorising sites and strong provisions for protecting significant historic heritage values. In this regard, these provisions indicate that listed heritage and archaeological sites are being appropriately protected.

District Plan Submissions

The second indicator which helps assess AER 6.3 is whether or not Horizons has been successful in submitting on district plans and district plan changes where it is necessary to ensure provisions are appropriate and consistent with the One Plan. The table below shows a snapshot on what heritage plan changes have taken place and whether or not a submission has been made and whether or not it was successful.

Territorial Authority	Plan Change	Decision on submission
Palmerston North	Original operative Plan Plan Change J: Massey University Turitea Historic Area (2023)	No submission from Horizons as the plan change was only open for limited submissions by pre-identified parties.
Whanganui	PC29 (2012) Horizons submitted no changes sought to PC29 Built heritage	No changes sought.
Manawatu	PPC46 (2013) Horizons submitted in favour of the Historic heritage provisions that were being proposed in the Plan change.	No changes sought.
Horowhenua	PC 22 (2012) Council submitted broad support for provisions in the Plan change including historic heritage related provisions	No changes were sought

Table 9 Horizons submissions on TA heritage plan changes

The Table shows that only three TA's have undergone public plan changes. In all three of these cases, Horizons has submitted general support for the heritage provisions included within. Horizons did not submit on the most recent Turitea Heritage Area Plan Change. The remaining plans were submitted on through the plan notification process and historic heritage provisions would have been supported.

In the One Plan, historic heritage is incorporated as conditions on a number of rules both in the RP and RCP. These conditions limit when and where certain activities may take place. Certain rules state that the activity must not take place to any listed historic heritage sites identified in a regional or district plan. Some rules state that activities must not take place within 50m of a listed site of identified historic heritage. The conditions ensure that the rules protect historic heritage values and sites against the activities which will have an adverse effect against them. These conditions are consistent across the sector and therefore are effective at providing appropriate protection. This basis indicates progress toward the AER. In terms of having a proactive approach, we rely on this information coming directly to us and then compliance enforces our standard conditions as opposed to actively having listed or mapped areas where there is a high likelihood of new discovery of archaeological sites.

Coastal Heritage

The One Plan does not provide adequate protection for historic heritage from inappropriate subdivision, use and development in the CMA. The RCP does identify some areas with historic heritage value in the Protection Activity Management Areas but does not identify other known heritage in the RCP. This is not however, what is required by Policy 6-12. Schedule I does not identify specific sites and it does not include a statement of the qualities that contribute to each site. Currently, there is only one Heritage NZ listed site located in the CMA in the Horizons Region; the wreck of the Hyderabad on Waitārere beach. This site is not identified in the RCP. This means that this part of the AER has not been achieved. The rules in the RCP do protect identified historic heritage where it applies to specific Protection Activity Management Areas in Schedule I.

5.2.3.1 Historic Heritage Effectiveness Conclusions

- The methods have not been implemented. An approach providing further proactive identification of historic and archaeological sites has not been determined as directed by Method 6-10. Therefore Policy 6-12 has not been given effect to in the way it was intended. Policy 6-11 has been partially implemented through the rules in the regional and district plans specifically where these apply to historic heritage protection by the TA's. The protections granted through activity class statuses is appropriate but this only applies to sites that are listed. Any known sites that are not listed in a district plan are not protected and therefore this policy has only been partially implemented. There are provisions in the RCP that must have regard to Policy 6-11, however, not all heritage is protected as intended due to specific known heritage in the CMA not being listed in Schedule I. The result of this means that there is a gap where historic heritage which should be identified in the CMA is not listed in Schedule I and the level of protection that should be afforded is not fully realised. Method 8-4 not being fully implemented also contributes to this gap.
- The AER indicators show that the intent of the historic heritage provisions have partially been achieved. All of the district plans contain schedules with lists and/or maps of the historic heritage within their districts. The district plans include provisions which protect these listed sites and values from inappropriate subdivision, use and development. The Regional Council has been satisfied with the level of protection that district councils have afforded to listed historic heritage sites.
- Where the AER has not been achieved is the identification and protection of historic heritage in the CMA. This is because a Schedule of historic heritage has not been developed to give effect to Policy 6-12 and a known heritage site is missing.

6. Efficiency assessment

The biggest factors influencing the efficiency section of this evaluation are information and jurisdiction. The efficiency of provisions is usually measured through cost, in particular, cost of implementation. The effectiveness evaluation has highlighted that many of the methods in Chapter 6 and Chapter 8 have not been fully implemented (and therefore have no cost), and it is difficult to assess the cost of methods that are partially implemented through other programmes. The only applicable measurement that can be made through this desktop assessment is through the costs of processing resource consents. It is important to note that these are only the costs incurred by the Council and then passed onto the applicant. It does not include costs to the applicant from preparing the application, nor does it include the cost of complying with any consent conditions.

Costs of Consents

Over the three topics, consents planners have identified 53 consents over the life of the One Plan which specifically relate to the provisions in Chapter 6. The table below shows the total costs of consents as they relate to each subtopic.

Sub Topic	Number of Consents	Total Costs	Average Consent Cost
ONFL	22	\$52,230.29	\$1,973.05
Natural character	22	\$127,505.14	\$4,945.27
Historic heritage	9	\$21,589.76	\$2,430.33
Total	53	\$201,325.19	

Table 10 Costs of consents

It is important to note that there are five natural character consents which are missing information of costs. This means that the total cost for natural character consents is likely higher than what is recorded. Furthermore, it is important to note that these consents cover a range of other activities within the application. This means that these costs apply to more than just the ONFL, natural character or heritage provisions. Across the life of the One Plan, the total cost for consents over all three subtopics totals roughly an estimated \$201,325.19. These costs are to consent applicants and only show consents that have been authorised. This total cost covers the ten years the Plan has been operative. These costs seem appropriate when compared to other types of resource consents however, it should be noted that most of the true cost of implementing these provisions would occur at the district planning level. It should also be noted that efficiency cannot be assessed by looking at cost alone, the size of costs must be compared to the size of benefits to fully understand efficiency.

Efficiency Conclusions

There is insufficient information to measure efficiency through costs. The result of this is that no robust assessment is possible outside of looking at the cost of consents. There is little indication that the provisions that are in place, which have been implemented, are inefficient. Furthermore, with much of the provisions falling to the TA level, the scope of what is implemented by Horizons is narrowed significantly. With the little amount of implementation of provisions for the CMA, efficiency cannot be adequately assessed.

7. Overall Assessment

Effectiveness

ONFL

The ONFL provisions have been partially implemented. Method 6-7 has been implemented and Method 8-2 has been partially implemented. Methods 6-8 and 8-4 have not been implemented. The result of this is that the methods largely have not fully realised the intent of the policies they give effect to. This becomes especially evident where specific gaps in the policy framework appear in relation to ONFL and the RCP. The RCP does have provisions which cross reference back to the Chapter 6 policies. However because Methods 6-8 and 8-4 have not been fully implemented and because specific ONFL have not been identified in Schedule I of the RCP in a manner which protects them as ONFL, the protection required for these ONFL in the CMA have not been fully achieved. Furthermore, there are no specific rules in the RCP that protect ONFL because they have not been identified in Schedule I.

The AER's in Chapter 6 and Chapter 8 also do not show a clear picture of effectiveness. The indicators for AER 6.4 largely show effectiveness where information is accessible and measurable. The first indicator cannot be properly assessed because the main data source (landscape surveys) which would provide the appropriate information has not been undertaken. This is largely because of the high cost nature of these surveys combined with the relatively low priority of the topic. The submissions indicator is not a very valuable or effective indicator for assessing the AER because it does not capture what "good" is. It merely indicates if submissions were successful. Despite this, this indicator does show that Method 6-7 is being implemented because Horizons has submitted on ONFL plan changes where those are applicable. The results of these submissions have always resulted in a favourable outcome through the planning processes both in successful submissions and through submissions that were not accepted either in part or in full. While the indicator is not the most valuable for assessing the AER, it does show that Horizons has implemented Method 6-7 which implies a level of effectiveness of the provisions. The third indicator is the protections afforded to the ONFL by the district plans. The district plans are largely consistent with the One Plan with the exception of Tararua DC and Whanganui DC. These two councils have not yet fully undergone a notified ONFL plan change. Outside of these two TA's, the rules and provisions in all the other plans are adequate and sufficiently protect listed ONFL. The evaluation looked at some specific examples of activities which were consented which were tested against the district plans provisions. In these examples, an appropriate level of protection is provided for ONFLs and the consistency of the provisions across plans indicates that all TA's with provisions have adequate protection. This indicates positive progress towards achieving the AER. Considering all of these indicators together, the AER is being partially achieved. While we do not have the data to measure actual damage to the terrestrial ONFL characteristics, the available planning evidence suggests effective protections are in place. This does not apply to coastal ONFL. AER 8.2 uses the same indicator as the first under 6.4. This is also insufficient data for this AER, and the RCP does not appear to adequately identify and protect ONFLs.

Natural Character

Overall, the available evidence suggests that the natural character provisions in the One Plan are largely effective. TA Protection in the District plans is sufficient and appropriate where information is available. The provisions in the District Plans recognise the national importance of protecting natural character. The provisions cascade to protect natural character components from adverse effects of activities such as inappropriate subdivision, use and development. The provisions in the district plans are all consistent with the One Plan. The regional resource consent data that is available suggests that appropriate consideration is being awarded to activities which affect identified components of natural character. Largely, consents have been granted only for activities which have negligible effects to natural character and public access suggesting the intent of the policies is given effect to through the consenting process.

All of the methods in the RPS have been implemented. Method 6-7 has been achieved through the Regional Council submitting on all plans. Method 8-2 has been implemented in part as identified in the Coastal section 35 evaluation. Method 5-11 has partially been implemented. Some low priority work has taken place to assess natural character in rivers. There have also been reports on water related topics such as gravel which include in some small parts, natural character assessments. No specific research programmes have been implemented but the work of assessment is still

loosely being carried out in other projects. The resulting evidence concludes that methods have been implemented in parts supporting that the methods are appropriately reflecting the intent of the Policies and Objectives. This indicates that the provisions are largely effective.

Historic Heritage

The provisions for protection of historic heritage are considered partially effective. The AER indicators show that the intent of the historic heritage provisions have partially been achieved. All of the district plans contain schedules with lists and/or maps of the historic heritage within their districts. District plans include provisions which protect these listed sites and values from inappropriate subdivision, use and development. The Regional Council has been satisfied with the level of protection that District Councils have afforded to listed historic heritage sites. The Regional Council has not submitted on Territorial Authority historic heritage consents planning processes. Historic heritage is appropriately protected in the RP with specific conditions on rules around activities within historic heritage boundaries. There is also policy support in the RCP which links back to Policy 6-11. However, as the CMA is not managed by TA's Horizons must protect any heritage in the CMA. To date, there is only one site (wreck of the Hyderabad). Because it is not listed in district plans, there is a gap where it is also not listed in Schedule I. This means that it does not have the full amount of protection that it would have if it was and displays a gap in the framework. The non-regulatory methods have not been implemented. Method 6-10 and Method 8-4 both seek to proactively gather further information of historic heritage and areas which have a high potential for containing archaeological and historic heritage. They seek to set up the means of collecting this information. These methods have not been implemented. Reasons for this largely stem from a combination of low priority and cost.

Where the AER has not been achieved is the identification and protection of historic heritage in the CMA. This is because there are no listed sites in the RCP and therefore no protections apply because rules and conditions only apply to *listed* historic heritage. While this is only currently the case for one, known location of historic heritage in the CMA, it displays a gap in One Plan function and protection.

Efficiency

There is insufficient information to conclude whether or not the provisions have been efficient. Firstly, much of the protections under this topic are directed towards the TA's to manage which means Horizons does not incur those costs. Secondly, assessing the cost of implementing methods can only take place if those methods have been implemented. With such a large number of methods not having been implemented or implemented in the way they were intended, measuring costs become difficult and given this is a desktop evaluation, there is no clear or accessible ways of reliably measuring efficiency. Included in this report is some costs of consents that are tagged as relating to relevant provisions but the costs of these consents are considered reasonable when considering that the provisions are legally required by higher level direction and that these cost also include other activities outside of the subtopics.

8. References

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9. Appendices

Appendix 1

Table G.1

Outstanding Natural Features or Landscapes	Characteristics / Values
(a) Tongariro National Park	<ul style="list-style-type: none"> (i) Visual and scenic characteristics, particularly the park's visual prominence in the Region and the contrast of the Rangipo desert with adjacent landscapes (ii) Geological features including the Rangataua Lava Flow (iii) Recreational values, particularly tramping and snow sports (iv) Scientific value, particularly the volcanic landscape (v) Ecological value, particularly the mountainous ecology and the extensive tussock grasslands and wetlands supporting rare indigenous flora (vi) Importance to tangata whenua
(b) Whakapapa River and river valley, including all of the river catchment	<ul style="list-style-type: none"> (i) Visual and scenic characteristics (ii) Recreational values (iii) Ecological significance, particularly in providing a habitat for the Blue Duck (whio)
(c) Whanganui River and river valley, upstream of Aramoana	<ul style="list-style-type: none"> (i) Scenic qualities provided by the gorge landscapes and papa rock formations (ii) Recreational values, particularly tramping and hunting, and those provided by the water and riparian margins (iii) Ecological value provided by the presence of original forest remnants (iv) Importance to tangata whenua (v) Historic heritage, in particular historical importance and numerous archaeological sites
(d) Whanganui National Park	<ul style="list-style-type: none"> (i) Visual and scenic characteristics, particularly the gorge landscapes and papa rock formations (ii) Ecological significance, particularly for providing habitat for rare bird species, the presence of mature indigenous forest, contribution to the national conservation estate, wilderness (iii) Intrinsic value (iv) Importance to tangata whenua

Outstanding Natural Features or Landscapes	Characteristics / Values
	<ul style="list-style-type: none"> (v) Recreational values, particularly tramping and hunting, and those provided by the water and riparian margins (vi) Recognised protection – national park (vii) Historic heritage, in particular historical importance and numerous archaeological sites
(e) Kaimanawa Ranges, in particular the skyline and the south-eastern side of the ranges	<ul style="list-style-type: none"> (i) Visual and scenic characteristics, particularly the visual prominence of the skyline in much of the Region (ii) Ecological significance, including the Ranges' contribution to the national conservation estate
(f) The skyline of the Puketoi Ranges defined as the boundary between the land and sky as viewed at a sufficient distance from the foothills so as to see the contrast between the sky and the solid nature of the land at the crest of the highest points along the ridges	<ul style="list-style-type: none"> (i) Visual and scenic characteristics, particularly the visual prominence of the skyline in the eastern part of the Region (ii) Geological features, particularly the asymmetrical landform termed a cuesta
(g) Mount Aorangi - Awarua	<ul style="list-style-type: none"> (i) Visual and scenic characteristics, particularly Mount Aorangi's visual prominence and contrast to the Mangaohane Plateau (ii) Intrinsic value (iii) Ecological significance, provided by areas of unmodified podocarp forest, high diversity of wetland types and as a habitat for rare indigenous flora and fauna (iv) Scientific value, particularly Reporoa Bog and Makirikiri Tarns (v) Importance to tangata whenua
(h) Manganui o te Ao River and river valley, including the Makatote and Mangaturuturu Rivers and their valleys, the Waimarino and Orautoha Streams (but not the Waimarino and Orautoha valleys or the Ruatiti Stream or valley)	<ul style="list-style-type: none"> (i) Visual and scenic characteristics, particularly river gorges and riparian margins and outstanding wild and scenic characteristics (ii) Ecological significance, providing a habitat for the Blue Duck (whio), and wildlife and fisheries (iii) Recognised protection – National Water Conservation Order (iv) Historic heritage, in particular historical importance, archaeological sites and high potential for archaeological site discovery
(i) Rangitikei River and river valley from Mangarere Bridge (approximate map reference NZMS 260 T22:488-496) to Putorino (approximate map reference NZMS 260 T22:315-315), and from Mangarere Bridge (approximate map reference NZMS 260 T22:488-496) to the confluence of	<ul style="list-style-type: none"> (i) Visual and scenic characteristics – particularly its gorges, the Rangitikei alluvial terraces and high bluffs, and the Rangitikei River Plio-Pleistocene fossiliferous sediments (map reference NZMS 260 S23:214-224) (ii) Scientific and educational value

Outstanding Natural Features or Landscapes	Characteristics / Values
Whakaurekou River and Ohutu Stream (approximate map reference NZMS 260 U21:714-691)	(iii) Historic heritage, in particular historical importance, archaeological sites and high potential for archaeological site discovery
(j) The Ruahine Forest Park (land administered by the Department of Conservation)	(i) Visual and scenic characteristics, particularly its prominence throughout much of the Region and its backdrop vista in contrast to the Region's plains (ii) Ecological values, including values associated with mature indigenous forest, remnant and regenerating indigenous vegetation and important habitat (iii) Contribution to the national conservation estate (iv) Recreational values, especially tramping and hunting (v) Historical values associated with early recreation, hunting and botanical exploration (vi) Cultural values
(k) The Tararua Forest Park (land administered by the Department of Conservation)	(i) Visual and scenic characteristics, particularly its prominence throughout much of the Region and its backdrop vista in contrast to the Region's plains (ii) Ecological values, including values associated with mature indigenous forest, remnant and regenerating indigenous vegetation and important habitat (iii) Contribution to the national conservation estate (iv) Recreational values, especially tramping (v) Historical values associated with early recreation (vi) Cultural values
(l) The series of highest ridges and highest hilltops along the full extent of the Ruahine and Tararua Ranges, including within the Forest Parks described in items (j) and (k)	(i) Visual, natural and scenic characteristics of the skyline of the Ruahine and Tararua Ranges, as defined by the series of highest ridges and highest hilltops along the full extent of the Ruahine and Tararua Ranges, including the skyline's aesthetic cohesion and continuity, its prominence throughout much of the Region and its backdrop vista in contrast to the Region's plains (ii) Importance to tangata whenua and cultural values (iii) Ecological values including values associated with remnant and regenerating indigenous vegetation (iv) Historical values (v) Recreational values
(m) Manawatu Gorge, from Ballance Bridge to the confluence of the Pohangina and Manawatu Rivers, including the adjacent scenic reserve	(i) Visual and scenic characteristics, particularly provided by its distinctive landscape (ii) Geological feature, provided by being the only river in New Zealand to drain both east and west of the main divide (iii) Ecological significance, provided by its regenerating indigenous vegetation and remnant native shrubland (iv) Scientific value, particularly for its geology
(n) Parts of the Coastline of the Region, particularly the Ākitio Shore Platform, Castlecliff to Nukumaru coastal cliffs, Foxtangi Dunes, Hokio Beach South Dune Fields and Santoft parabolic dunes	(i) Visual and scenic characteristics, particularly its special coastal landscape features (ii) Coastal geological processes (iii) Ecological value, particularly the Whanganui, Whangaehu, Turakina, Rangitikei, Ākitio, Ōhau,

Outstanding Natural Features or Landscapes	Characteristics / Values
	<p>Waikawa and Manawatū River estuaries as habitats for indigenous fauna</p> <p>(iv) Recreational value</p> <p>(v) Significance to tangata whenua</p> <p>(vi) Scientific and educational values</p> <p>(vii) Historic heritage, in particular historical importance, archaeological sites and high potential for archaeological site discovery.</p>
(o) Cape Turnagain	<p>(i) Visual and scenic characteristics, particularly its visual prominence along the Region's east coast</p> <p>(ii) Ecological significance, particularly as a habitat for blue penguins and fur seals</p> <p>(iii) Scientific value</p> <p>(iv) Significance to tangata whenua</p> <p>(v) Historic heritage, in particular historical importance, archaeological sites and high potential for archaeological site discovery</p>

Appendix 2

Assessment factor	Scope
(a) Natural science factors	<p>These factors relate to the geological, ecological, topographical and natural process components of the natural feature or landscape:</p> <p>(i) Representative: the combination of natural components that form the feature or landscape strongly typifies the character of an area.</p> <p>(ii) Research and education: all or parts of the feature or landscape are important for natural science research and education.</p> <p>(iii) Rarity: the feature or landscape is unique or rare within the district or Region, and few comparable examples exist.</p> <p>(iv) Ecosystem functioning: the presence of healthy ecosystems is clearly evident in the feature or landscape.</p>
(b) Aesthetic values	<p>The aesthetic values of a feature or landscape may be associated with:</p> <p>8. Coherence: the patterns of <i>land</i>[^] cover and <i>land</i>[^] use are largely in harmony with the underlying natural pattern of landform and there are no, or few, discordant elements of <i>land</i>[^] cover or <i>land</i>[^] use.</p> <p>9. Vividness: the feature or landscape is visually striking, widely recognised within the local and wider community, and may be regarded as iconic.</p> <p>10. Naturalness: the feature or landscape appears largely unmodified by human activity and the patterns of landform and <i>land</i>[^] cover are an expression of natural processes and intact healthy ecosystems.</p> <p>11. Memorability: the natural feature or landscape makes such an impact on the senses that it becomes unforgettable.</p>

(c) Expressiveness (legibility)	The feature or landscape clearly shows the formative natural processes or historic influences that led to its existing character.
(d) Transient values	The consistent and noticeable occurrence of transient natural events, such as daily or seasonal changes in weather, vegetation or wildlife movement, contributes to the character of the feature or landscape.
(e) Shared and recognised values	The feature or landscape is widely known and is highly valued for its contribution to local identity within its immediate and wider community.
(f) Cultural and spiritual values for <i>tangata whenua</i>^	Māori values inherent in the feature or landscape add to the feature or landscape being recognised as a special place.
(g) Historic Heritage values	Knowledge of historic events that occurred in and around the feature or landscape is widely held and substantially influences and adds to the value the community attaches to the natural feature or landscape. Heritage features, <i>sites</i> * or structures that are present and add to the enjoyment and understanding of the feature or landscape.

Appendix 3

Relevant provisions in this evaluation which have either not been implemented or have only been partially implemented.

Provision	Implementation status
Method 5-11	Not officially implemented but targets are achieved in part through other work programmes
Method 6-8	Not implemented
Method 6-10	Not implemented
Method 8-2	Considered partially implemented through other programmes
Method 8-4	Not Implemented
Policy 6-10	Has no methods or an AER attached to it.



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