2.13 Historic heritage – section 32 evaluation for the Proposed Auckland Unitary Plan

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1. Overview and Purpose
This evaluation should be read in conjunction with Part 1 in order to understand the context and approach for the evaluation and consultation undertaken in the development of the Proposed Auckland Unitary Plan (the Unitary Plan).

1.1 Subject Matter of this Section
Evaluation of Historic Heritage
The purpose of the proposed approach is to address the lack of knowledge about the significance of historic heritage places in a consistent, efficient and transparent manner. The proposed approach involves one set of criteria which harmonises the range of existing criteria in legacy plans and is compatible with the criteria set out in Historic Places Act 1993 (s23) and the values identified in s2 of the RMA 1991. The evaluation approach is qualitative (text based) and includes statements of significance. The purpose of this analysis is to consider whether the objective, and policies and methods in the UP that provide for the identification of significant historic heritage places are appropriate. The relevant plan provisions are set out in Chapter B Section 4.1 of the draft plan.

There is a separate set of criteria for sites and places of significance to mana whenua (Chapter B Section 5.4). Council policy is to schedule places that have mana whenua values only as sites or places of significance to mana whenua.

1.2 Resource Management Issue to be Addressed
The Unitary Plan in Chapter B section 1.3 Protecting our historic heritage, special character and natural heritage identifies the following as an issue of regional significance:

Auckland has a rich historic heritage. Historic heritage places are part of our identity and create an important link to the past. They are unique, non-renewable resources that require protection for present and future generations.

The issue description in section 1.3 states:
Growth and development in urban, rural and coastal areas has altered or destroyed much of Auckland’s historic heritage and places of cultural importance. Further growth places pressure on our ability to protect historic heritage. Lack of knowledge on places also limits our efforts to protect our historic heritage.

Our challenge is to ensure we protect our historic heritage while enabling growth and appropriate use and enjoyment of these places for future generations.

The issue is being able to address the lack of knowledge about the significance of historic heritage places in a consistent, efficient and transparent manner. The legacy plan provisions include disparate criteria and methodologies.

1.3 Significance of this Subject
The single change of any significance is to have one set of criteria which harmonises the range of existing criteria in legacy plans and is compatible with the criteria set out in Historic Places Act 1993 (s23) and the values identified in the s2 of the RMA 1991. The new unified Auckland-wide evaluation system is based on a single set of criteria and thresholds and applicable to all forms of historic heritage both on land and in the coastal marine area.

1.4 Auckland Plan
The Auckland Plan Priority 1 is Understand, Value and Share Our Heritage. The plan recognises that the existing information base for our heritage is incomplete, out-dated or inaccurate in many areas. The Auckland Plan identifies that an improved evidence base will provide a consistent way of assessing heritage values, inform decision making and provide an accessible public record for public use and enjoyment.
Directive 4.1 is Provide a robust information base for Auckland’s historic heritage and Directive 4.2 is Identify, protect and conserve our locally, regionally, nationally and internationally significant historic heritage.

The Auckland Plan Chapter 15 Measuring Progress has as Strategic Direction 4 the following targets and measures:

<table>
<thead>
<tr>
<th>Target</th>
<th>Measure</th>
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<tbody>
<tr>
<td>Increase the number of scheduled places by 100% from 2100 to 4200 by 2030</td>
<td>Number of scheduled historic heritage places</td>
</tr>
<tr>
<td>Increase the percentage of area in Auckland that has been assessed for historic heritage values from 30% to 100% by 2040, prioritising areas identified for growth and intensification</td>
<td>Area and proportion of land surveyed for heritage values</td>
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1.5 Current Objectives, Policies, Rules and Methods

The heritage objectives in legacy plans are generally similar. All had objectives relating to the identification of historic heritage. The legacy plans also have differing heritage evaluation systems, albeit of varying quality.

The legacy plan provisions, including their disparate criteria and methodologies, were developed and made operative when district plans only had to be 'not inconsistent' with the provisions of the operative ARPS. Therefore, there could be different evaluative methodologies as long as they were not inconsistent with the ARPS. It is arguable as to whether or not some legacy plans met the not inconsistent test. The RMA now requires that the district plan is to give effect to an operative regional policy statement.

1.6 Information and Analysis

An analysis of the legacy plan evaluation systems was undertaken. It found that the particular issues with retaining and carrying over the legacy provisions are:

- Complexity of employing 14 different evaluation systems for identifying significant historic heritage places
- Inconsistent terminology and/or definitions between evaluation systems
- Some legacy plans lack criteria and/or thresholds for identifying significance of some categories of heritage (for example places of significance to Maori or archaeological sites)
- Significance is not ranked consistently amongst legacy plans. Some legacy plans do not contain explicit thresholds/criteria for ranking historic heritage. In some plans there is one category, in others two or three. The implications of this are that there would need to be a complex suite of policies and rules tailored to legacy categories of significance
- Some legacy evaluation criteria are not compatible with the criteria included in the RMA and HPA
- Some heritage places extend across plan boundaries (notably the CMA boundary), or include multiple categories of heritage places (built, archaeological, places of mana whenua significance etc) so more than one legacy evaluation system is applicable
Some evaluation systems were formulated prior to 2003 RMA amendments, and have not subsequently been updated and therefore may not be completely aligned with the RMA.

No legacy systems represent international best practice.

1.7 Consultation Undertaken
The evaluation methodology has been through an iterative process with key stakeholders and potential users. These have included the Heritage Advisory Panel, an independent body composed of community and iwi representatives and heritage experts; a consultant group that has trialled the methodology on places nominated for evaluation; a heritage review group which comprised heritage specialists from within the Auckland Council Built and Cultural Heritage policy and implementation teams, external planning consultants and a representative from the Unitary Plan team. The purpose of the latter group was to meet and review issues in relation to the draft evaluation criteria, thresholds and methodology arising from internal or external feedback and to reach agreement on changes required.

There was limited feedback from the draft Unitary Plan (March version), predominantly from major stakeholders, on the evaluation approach to historic heritage. It was generally positive and only one substantive change was considered necessary. This change was to the categories for groupings of heritage places and not to the evaluation system or criteria. A minor change to the wording to allow a place that was significant in relation to a single criterion to be scheduled was also made in response to submissions by the NZ Historic Places Trust and Heritage Advisory Panel. No feedback on the evaluation approach was received from mana whenua groups.

1.8 Decision-Making
Proposed changes to the March draft of the Unitary Plan are reviewed by the Unitary Plan Oversight Group, which comprises senior council managers. The changes are then referred to the Auckland Plan Committee for feedback. Final decisions will be signed off at a meeting of the Committee between 28-30 August 2013.

1.9 Proposed Provisions
The essence of the proposed provisions is to have a unified Auckland-wide evaluation system based on a single set of criteria and thresholds and applicable to all forms of historic heritage both on land and in the coastal marine area.

1.10 Reference to other Evaluations
This section 32 report should be read in conjunction with the following evaluations:

- 2.12 Pre-1944 demolition
- 2.15 Mana Whenua cultural heritage
- 2.18 Maori and natural resources

2. Objectives, Policies and Rules

2.1 Objective
The following objectives are proposed:

RPS (Chapter B) 4.1 (1). Auckland's significant historic heritage places are identified and protected.

There are two parts to this objective: identification and protection. This evaluation focuses on identification.
Appropriateness of the Objective(s)

There is a range of legislation that is relevant to the identification and management of historic heritage. Some legislation sets the context within which historic heritage is to be managed. Other legislation provides tools and mechanisms that can be used to assist with the management of historic heritage, or includes specific requirements that historic heritage be recognised and provided for. There are the provisions of the Resource Management Act 1991, Hauraki Gulf Marine Park Act 2000 and the Waitakere Ranges Heritage Area Act 2008.

The RMA has a matter of national importance (section 6): 
(f) the protection of historic heritage from inappropriate subdivision, use, and development

Historic heritage is defined within the RMA as:

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

Linking to the Historic Places Act, the RMA requires (section 66 and 74) that in the preparation of the unitary plan regard be had to:
(c) (iiia) any relevant entry in the Historic Places Register

The Hauraki Gulf Marine Park Act (section 8) requires the management of the Hauraki Gulf to include:
(b) the protection and, where appropriate, the enhancement of the natural, historic, and physical resources of the Hauraki Gulf, its islands, and catchments:

The Waitakere Ranges Heritage Area Act 2008 establishes the Waitakere Ranges Heritage Area, which covers the land area of the Waitakere Ranges and parts of the foothills. Its purpose is to recognise the national, regional and local significance of the Waitakere Ranges heritage area and promote the protection and enhancement of its heritage features for present and future generations. The heritage features of the area are defined (section 7), with recognition that individually or collectively these features contribute to the area's significance. The heritage features include:
(i) the historical, traditional, and cultural relationships of people, communities, and tangata whenua with the area and their exercise of kaitiakitanga and stewardship:
(k) the evidence of past human activities in the area, including those in relation to timber extraction, gum-digging, flax milling, mineral extraction, quarrying, extensive farming, and water impoundment and supply:
the Waitakere Ranges Regional Park and its importance as an accessible public place with significant natural, historical, cultural, and recreational resources.

The Auckland Council in the Unitary Plan is also required to give effect to the New Zealand Coastal Policy Statement 2010 (NCPS). Policy 17, particularly (a) and (c) of the NCPS directs councils to include policies, rules and other methods relating to the identification and assessment of historic heritage in the coastal environment in regional policy statements and plans. The objective synthesises the imperatives of the relevant legislation, particularly Part 2 of RMA. The robust identification of historic heritage through a region wide consistent evaluation process is a first necessary step in the protection of Auckland’s historic heritage.

The Local Government Act 2002 (LGA) provides the functions and powers to achieve an outcome through the objective. The LGA states that the purpose of local government is to promote four well-beings of communities, including cultural well-being, in the present and in the future (section10).

S 30 provides that the regional council has the following functions for the purpose of giving effect to the RMA in its region:

(a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region:

(b) the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance:

Protecting historic heritage and historic character is identified as an issue of regional significance. The establishment of objectives and policies and their implementation through the methods relating to historic heritage evaluation seek to give effect to the Act in an efficient and transparent way. It also enables the integrated management of resources so that the historic heritage values of the region are explicit and are able to weighed against all other values, constraints and opportunities in planning for the region

2.1.1 Policies
The relevant policies are Chapter B Sec 4.1 Policies 1 to 5. Policies 1 to 5 sequence in logical order with Policy 1 to identify historic heritage through an approach that considers all values that are set out in Policy 2. The Policy 2 criteria are broad enough to be applicable to the full range of heritage types. Policy 3 is to evaluate places for their overall significance against the Policy 2 values. Policy 4 relates to the definition of the geographic extent of a place in terms of its physical and contextual factors. Policy 5 defines the significance thresholds for determining whether a place or area is significant enough to be included in the UP schedule of significant historic heritage places and on the UP maps as a historic heritage overlay. There are two significance categories (A, B) for both places and for groupings of places (historic heritage areas).

Efficiency
The legacy councils and their respective plans had a variety of evaluation methodologies. Having a single evaluation methodology is significantly more efficient to communicate and promote, and for evaluators, owners of places and decision makers to apply and therefore has a higher level of achievability than the alternatives. Identification of historic heritage is taking place at a significantly faster pace than is likely to have occurred with continuing with the existing group of criteria and methodologies. Alignment of criteria provides improved translation of values between Historic Places Act registration evaluations and the UP criteria, resulting in efficiency gains in evaluating registered historic places. Alignment with values-based heritage conservation plan methodology provides improved translation of values where conservation plans are required for heritage places.
Achievability

The proposed evaluation system has already been employed to evaluate heritage places as follows:

2011-12
District Plan Evaluations: 44 places evaluated, 28 places included in draft schedule
Unitary Plan Evaluations: 66 places evaluated, 38 places included in draft schedule
Private Plan change: 1 place added to schedule

2013
Additional places and areas have been evaluated using the supporting methodology in the Mangere-Otahuhu, Onehunga, Balmoral and Puketapapa historic heritage surveys. These surveys have also tested and validated the methodology which has been found to be robust with only minor refinements being made. Fifty nine new individual places and 11 new areas were added to the schedule.

There has been significant public interest in nominating historic heritage places for evaluation and potential inclusion in the historic heritage schedule of the Unitary Plan. Nomination forms and a guidance document have been made available to local boards and placed on the council website. Because of a lack of resources and time constraints, only 7 nominated places were able to evaluated and added to the schedule between the release of the draft UP and finalization of changes to the notified version of the UP. It is anticipated that further additions can be incorporated within the UP by way of plan changes or variations.

The UP schedule of significant historic heritage places (Appendix 9) includes all the scheduled places in the legacy district and regional plans including proposed plan change 38 (Auckland Council District Plan Operative North Shore Section 2002). The only exceptions are those that no longer exist or where an Environment Court decision has directed that they be removed. Some adjacent places were amalgamated, while duplicate entries (for example where a place was scheduled in both the district and regional plan) were removed. A desktop review of each place was undertaken to translate the legacy plan schedule criteria and categories to the proposed UP criteria and the categories of significance (set out in Chapter B Sec 4.1 Policy 5). The values attributed to each scheduled place are identified in the schedule (Appendix 9 of the UP). Some places derived from legacy plans will be formally re-evaluated against the Unitary Plan evaluation criteria as part of a future project, with a view to confirming or changing the category currently assigned.

2.1.2 Methods

Inherent in identification and deciding whether something is sufficiently worthy of protection is a robust evaluation process. The Methods section (in Chapter B Sec 4.1) includes under Non-Regulatory:

Monitoring and information gathering:
- On-going research to identify significant historic heritage places:
- Methodology for evaluation of historic heritage significance
- Thematic research framework

Further, under Funding and assistance:
- Auckland Heritage Survey: guidance for area assessments
- Guidelines for nominating a historic heritage place for evaluation

The methodology for evaluating historic heritage significance sits outside of the Unitary Plan. It is proposed that a guidance document will be prepared to assist with the use of the
methodology. The guidance document will include benchmarked examples and recommendations for standardised terminology to be used in statements of significance.

Thus the Unitary Plan contains the historic heritage significance criteria and thresholds and the methodology guides the process of evaluating the values of historic heritage against those criteria and ensures there is consistency in the way a place is evaluated. The methodology includes the following parts:

• Outline of the steps in the process of evaluation
• Inclusion and exclusion indicators to guide whether or not a place has value against each criterion.
• Description and examples in preparing a statement of significance - a succinct statement of how and why a place is important
• Guidance on the process for recommending whether the place should be scheduled
• Guidance on defining the extent of the place for scheduling.

2.1.3 Costs and Benefits of Proposed Policies and Rules

<table>
<thead>
<tr>
<th>Costs</th>
<th>Transaction costs will fall on the council and therefore the wider community when historic heritage surveys are undertaken. Costs will be incurred by interested parties in responding to the results of evaluations.</th>
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<tr>
<td></td>
<td>Transaction costs will also fall on owners where the methodology is used for instance in the assessment processes relating to the pre-1944 demolition controls.</td>
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<td></td>
<td>Potential for an increase in the number of scheduled items and areas in the plan and therefore potential for increased costs/lost development opportunities for some landowners.</td>
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<td></td>
<td>Current levels of information may not justify scheduling of some places, however further research may uncover additional information that may further inform the heritage significance of the item and therefore justify its inclusion in the schedule or result in a change in category.</td>
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<tr>
<th>Benefits</th>
<th>Council responsibilities for heritage identification are being undertaken in a clear and transparent manner. Publicly available statements of significance clearly articulate the values of a place and the justification for inclusion in the plan schedule.</th>
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<td></td>
<td>Ability to ensure that the criteria and methodology are consistent with recent legislation and the NCPS.</td>
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<td>Fulfills broader RMA need for certainty by subjecting all potential listings to a consistent, rigorous process.</td>
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<td>In the longer term, formal re-evaluation of items scheduled by legacy councils may result in some places that do not meet UP being removed from the schedule.</td>
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<td></td>
<td>Transaction costs with a single evaluation system and methodology are intuitively significantly less than using the disparate legacy plan systems.</td>
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<td></td>
<td>The immediate users of the criteria and methodology are usually professionals with relevant qualifications and experience. The other users are those who use and action the outputs from individual places being</td>
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evaluated. These include the owners of places, their advisors, communities, interest groups and individuals who have an interest in historic heritage matters. Many of the immediate users have been involved in the development of the methodology. As the methodology sits outside of the plan, it is able to be readily updated to respond to lessons learned in its application to places.

The principal benefit or value to economic growth is that a single methodology contributes in an efficient manner to identifying what historic heritage should be protected, and communicating the values of heritage to Aucklanders.

This has two benefits:
Identifying significant historic heritage means that it can be protected and promoted as part of Auckland’s appeal to international and domestic visitors, investors and immigrants.
Provides greater certainty to the investment community on where to focus on areas where extensive redevelopment is possible because of the absence of significant heritage values.

Conversely, it also enables identification of areas where redevelopment which restores and maintains Auckland’s historic heritage values adds to Auckland’s appeal to residents and visitors.

Consistent quality of research and information employing a single evaluation system and methodology on heritage places will benefit the assessment of any future resource consent applications.

2.1.4 Adequacy of Information and Risk of Not Acting

| Risks | Protection of historic heritage depends on the efficiency and achievability of identification of historic heritage. The single set of significance criteria and single evaluation methodology is more efficient and therefore can be achieved at a faster pace. The need to accelerate the pace of identification is a function of several factors, including the pace of economic activity and the extent of potential redevelopment which is enabled as part of the change in land use strategies in the UP. Nevertheless there is a reducing risk as historic heritage surveys are undertaken in the areas prioritised for growth and intensification, and heritage places are assessed against the criteria and thresholds and appropriately protected in the UP. Application of a precautionary approach to areas that may have unidentified significant historic heritage places, particularly the interim pre-1944 development control (Chapter J 3.5) which requires an assessment that may lead to scheduling of a building, further reduces the risk of loss.

Not having a single methodology and retaining the legacy methodologies would only increase the risk of historic heritage being sufficiently identified for appropriate protection.

The risk with a multitude of evaluation systems is a potential loss of confidence in the robustness of the evidence base for scheduling and an increased risk of challenge. |
3. **Alternatives**
   Alternatives are:

1. Preferred

2. Status quo - Retain and carry over all legacy plan provisions relating to the identification and evaluation of significant historic heritage and continue to consider new proposals against the relevant legacy plan that applied to the geographical area in which the place is located.

The table below discusses each alternative compared to the Proposed Alternative
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<tr>
<th>Status Quo Alternative</th>
<th>Proposed Alternative</th>
<th>Alternative 2 No Evaluation System</th>
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<tr>
<td><strong>Appropriateness</strong></td>
<td>Some evaluation systems were formulated prior to 2003 RMA amendments, have not been updated and therefore may not be completely aligned with RMA</td>
<td>The policy and method support the objective to identify Auckland’s significant historic heritage</td>
</tr>
<tr>
<td><strong>Effectiveness</strong></td>
<td>The objective is to identify historic heritage. Overall significantly less effective than the proposed alternative.</td>
<td>Overall, it is fair, reasonable and more effective and robust in a single Unitary Plan to have one evaluation methodology.</td>
</tr>
<tr>
<td><strong>Efficiency</strong></td>
<td>Inefficient as multiple evaluation systems would be maintained</td>
<td>Overall a single evaluation methodology is significantly more efficient for promoters, evaluators, owners of places and decision makers. Evaluation is taking place at a significantly faster pace than is likely to have occurred if legacy evaluation systems had been maintained</td>
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<tr>
<td><strong>Costs</strong></td>
<td>As noted the legacy plans all had objectives relating to the identification of historic heritage. However, there were different evaluation systems. The particular issues with retaining and carrying over the legacy provisions are: Complexity of employing 14 different evaluation systems for identifying significant historic heritage Inconsistent terminology and/or definitions between evaluation systems Some legacy plans lack criteria and/or thresholds for identifying significance of some categories of heritage (for example places of significance to mana whenua or archaeological sites). Significance is not ranked consistently amongst legacy plans. Some legacy plans do not contain explicit thresholds/criteria for ranking historic heritage. In some plans there is one category, in others two or three. The implications of this are that there would need to be a complex suite of policies and rules tailored to legacy categories of significance Some legacy evaluation criteria are not compatible with the criteria included in the RMA and HPA Some heritage places extend across plan boundaries (notably the CMA boundary), or include multiple categories of heritage places (built, archaeological, places of significance to mana whenua etc) so more than one legacy evaluation system is applicable Some evaluation systems were formulated prior to 2003 RMA amendments, and have not subsequently been updated and therefore may not be completely aligned with the RMA No legacy systems represent international best practice.</td>
<td>Transaction costs on council when historic heritage surveys undertaken; costs to be incurred by interested parties; potential for increase in listed items and increased costs /lost development opportunities for some landowners</td>
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New evaluations would need to be undertaken in areas defined by defunct and increasingly irrelevant administrative boundaries that do not represent the communities of interest defined by the local board boundaries and would be undertaken according to an evaluation system that has not been reviewed. There is community criticism of some methodologies which leads to a situation where there are mixed levels of community support for the individual methodologies leading to a transaction cost to the council to reconcile those criticisms.

Costs include:
- Substantially increased complexity of policies and rules within the UP to be tailored to each legacy system.
- Council officers and users maintaining their knowledge and skills for each legacy system.
- Submitters, hearing panels and the Environment Court potentially having to understand each legacy evaluation system.

Opportunity costs include:
- Forgoing a region wide single methodology that reflects best practice and is regularly updated and
refined. The schedule is less likely to be comprehensive and will not occur within an overall regional or wider framework or context. Therefore gaps will occur in the schedule which won’t be fully representative of the range of historic heritage in the region. There would be no ability to apply a region wide comparative test for significance so would not know whether a place in the northern part of the region met the same thresholds in the southern part. The Auckland Regional Plan: Coastal is to some extent an exception as it provided a region wide comparative assessment for the region’s coastal marine area.

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<tr>
<th>Benefits</th>
<th>Risks</th>
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<tr>
<td>Heritage places already scheduled in legacy plans would not need to be translated or reviewed against a new and different set of criteria and thresholds. There may be less likelihood of challenge upon formal notification of the UP under some legacy plan criteria; however where there is doubt as to whether a place met either the legacy or the proposed new criteria that challenge through the submission process would take place anyway. Parts of the community will be familiar with the legacy system that related to that plan area. Arguably, since the development of district plans is a public process, the criteria and thresholds in a legacy plan should represent values attributed to historic heritage by people living in the district, which may be different to those in other parts of the region.</td>
<td>Protection of historic heritage depends on efficiency and achievability of identification of historic heritage Retaining the legacy methodologies likely decrease the pace of identification The pace will also be governed by budgetary provision Complexity through multiple methodologies increases risk of potential loss of confidence in robustness of evidence base and increased risk of challenge</td>
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<tr>
<td>Heritage identification taking place in consistent and transparent manner. Ability to ensure that criteria and methodology are consistent with legislation and NZCPS and can be updated to reflect best practice.</td>
<td>The single set of methodology is more efficient and therefore identification can be achieved at a faster and consistent pace. Having a single methodology reduces risk to historic heritage as surveys undertaken in areas of greatest potential change – the areas prioritised for growth The pace will also be governed by budgetary provision</td>
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</table>
4. Conclusion
Overall the proposed alternative is the most appropriate, as it better meets and is compatible with legislation that directs the management of historic heritage, is the most efficient, with greater benefits, likely less costs, and fewer risks compared with the alternatives of status quo and not having an evaluation system.

5. Record of Development of Provisions

5.1 Information and Analysis

| Baseline approach | Draft Methodology For Evaluating Historic Heritage Significance, *Auckland Council Heritage Unit*, December 2012 (Appendix 3.13.1)
|                  | Guidelines for Heritage Nominations; Heritage Nomination Form, *Auckland Council Heritage Unit*, 2013 (Appendix 3.13.2) |

| Relevant legislation and policy (not included in appendices) | Hauraki Gulf Marine Park Act 2000
|                                                              | Historic Places Act 1993
|                                                              | Local Government Act 2002
|                                                              | Resource Management Act 1991
|                                                              | Resource Management Reform Bill 2012
|                                                              | Waitakere Ranges Heritage Area Act 2008
|                                                              | New Zealand Coastal Policy Statement 2010 |

5.2 Consultation Undertaken
The immediate users of the criteria and methodology are usually professionals with relevant qualifications and experience. The other users are those who use and action the outputs from individual places that have been evaluated. These include the owners of places, their advisors, communities, interest groups and individuals who have an interest in historic heritage matters. Many of the immediate users have been involved in the development of the criteria, thresholds and supporting methodology. As the associated methodology sits outside of the plan it is able to be readily updated and refined to respond to lessons learned in its application to places.

|                      | Unitary Plan Feedback Report
|                      | Unitary Plan Feedback Report
### 5.3 Decision-Making

| Auckland Plan Committee | The Auckland Plan Committee discussed feedback and proposed changes to the UP historic heritage provisions at a workshop held on 31 July 2013. The meeting endorsed the recommended approach to historic heritage, including changes resulting from feedback on the March draft. Final decisions on the content of the notification version of the Unitary Plan will be made at a meeting of the Auckland Plan Committee to be held 28-30 August 2013 |