BEFORE THE FAR NORTH DISTRIC COUNCIL

PROPOSED DISTRICT PLAN HEARING PANEL

IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of the hearing of submissions on Hearing 12 - Historic and Cultural Values, District- Wide Matters, of the Proposed Far North District Plan
AND	
IN THE MATTER	of the submission # S409, Heritage New Zealand Pouhere Taonga (HNZPT)

STATEMENT OF EVIDENCE OF STUART BRACEY

ON BEHALF OF HERITAGE NEW ZEALAND POUHERE TAONGA

15 May 2025

1. INTRODUCTION

1.1. My name is Stuart Bracey. In February 2025 I took up the role of Heritage Planner for the Northern Region of Heritage New Zealand Pouhere Taonga (HNZPT). I am a qualified planner (Bachelor of Town Planning) with nearly 40 years of planning experience in local, regional and central government. I am full member of the New Zealand Planning Institute.

1.2. My public and private planning experience includes plan preparation, analysis of and submitting to plans and policy statements and preparing, lodging, submitting on and assessing a wide range of resource consent applications and designations. It also includes public consultation, working with a wide range of Iwi based groups, urban master planning, structure planning, infrastructure and transport planning. This experience has been gained working in the following;

- 15 years or so in Local Government – Waikato County Council, Whakatane District Council, Auckland Transport
- Some 10 years working in private development consultancies – Works Consultancy, Opus, Boffa Miskell, Babbage
- and over 10 years working in Central Government agencies – Housing New Zealand, Kainga Ora and currently HNZPT.

1.3. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with it when preparing this evidence. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise.

1.4. In circulating this Planning evidence, I have also considered and relied upon the opinions of other heritage professionals within my organisation. In particular Bill Edwards, the HNZPT Area Manager for Northland in relation to the heritage and cultural values of the relevant sites identified in HNZPT submission.

1.5. Please note that where any HNZPT submission point is accepted in the Council Planners S42a report, I generally discuss these matters no further in this evidence.

2. OUTLINE OF EVIDENCE

2.1. In my evidence I address:

a) the statutory framework, in particular the respective roles of the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) and the Resource Management Act 1991 (RMA) and planning instruments prepared under the RMA.

b) Key submissions HNZPT has made on the Heritage and Cultural values chapter of the Proposed District Plan.

c) the Council Planners Section 42A Report in relation to the key HNZPT submissions.

3. STATUTORY FRAMEWORK

3.1. The purpose of the HNZPTA (2014) is to promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand.[1]

3.2. The HNZPT has a number of responsibilities in addition to advocating for its interests at any public forum or in any planning process in which it has standing under an Act.[2] These include the preparation and maintenance of the New Zealand Heritage List / Rārangi Kōrero (the NZ Heritage List), previously called the Register, of historic places (Category 1 and Category 2), historic areas, wahi tapu, wahi tapu areas, wahi tupuna and wahi tupuna areas. As well as establishing and maintaining a list of places of outstanding natural value, the National Historic Landmarks / Ngā Manawhenua o Aotearoa me ōna Kōrero Tūturu. [3]

3.3. HNZPT also has responsibilities for the protection of archaeological sites. An archaeological site is defined in the HNZPTA as any place in New Zealand (including buildings, structures or shipwrecks) that was associated with pre-1900 human activity, which provides or may provide evidence relating to the history of New Zealand that can be investigated using archaeological methods.[4]

3.4. Local authorities, such as Far North District Council ("FNDC"), have complementary obligations under the RMA. Historic heritage is defined in the RMA as those natural and physical resources that contribute to an understanding and appreciation of New

[1] HNZPTA Part 1, s3.
[2] HNZPTA Part 2, s14 (1)(a).
[3] HNZPTA Part 2, s13.
[4] HNZPTA s6(a).

Zealand's history and cultures, deriving from any of the following qualities: archaeological, architectural, cultural, historic, scientific and technological.

3.5. It includes historic sites, structures, places, areas, archaeological sites, sites of significance to Māori, including wahi tapu, and surroundings associated with the natural and physical resources. [5]

3.6. In preparing a District Plan, councils must recognise and provide for matters of national importance concerning heritage:

- the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga (section 6(e))
- the protection of historic heritage from inappropriate subdivision, use and development (section 6(f))
- the protection of protected customary rights (section 6(g)).

3.7. Historic heritage is a matter of national importance under the RMA that requires all persons exercising functions and powers under the act to recognise and provide for in preparing policy statements and plans, and in the assessment of resource consent applications.[6]

4. KEY HNZPT SUBMISSION POINTS

4.1. In 2022, HNZPT made submission on the Proposed Far North District Plan. My evidence will focus on the following submissions points;

- General Heritage Identification and Protection (S409.019),
- The protection of Dry Stone Walls within the District (S409.020 and S409.029,
- The need for additional Heritage Overlay Areas or similar protection tools within the District Plan (S409.034,S409.035, S409.039 - S409.049).

[5] RMA Part 1 (1), s2.
[6] RMA s 6(f), ss. 61, 66, 74.

4.2. **General Heritage Identification and Protection** (S409.019).

At paragraph 374 of the section 42A report, the Council Planner acknowledges council's difficulty in identifying and identifying all heritage resources because there are high concentration of heritage and archaeological sites. At paragraph 375, the Council Planner indicated council cannot undertake some activities to identify heritage because funding has not been secured, or the council has not committed to it.

However, I continue to support HNZPT submission point S409.019 in relation to the need for ongoing identification of historic heritage for protection under the District Plan. Both HNZPT and FNDC have a role and responsibility in the ongoing protection of historic heritage.

I acknowledge that it is difficult to make significant resources available for a selection, research and assessment process to the level of detail undertaken in the past. But where and when significant heritage is identified I consider there are alternative methods and tools to ensure some form of protection is in place for the new areas proposed by HNZPT.

I discuss an alternative tool later in my evidence.

4.3. **The Protection of Dry-Stone Walls**(S409.019)

HNZPT submitted for a general protection rule for dry stone walls in the district. At paragraphs 366 and 367, The 42A writer rejected this submission because HNZPTA would provide sufficient protection for the stone walls constructed pre 1900s and indicated many dry-stone walls in the district are modern features. I don't agree with this. I refer to Bill Edward's evidence on the heritage and cultural value and what he has encountered in respect of the dry-stone walls in the District.

4.3..1. The building of dry-stone walls is unique human activity response to a geological area created through volcanic activity. These geological areas, which can be naturally very fertile land for farming activities, can be found in both the Whangarei District and the Far North District (and other parts of NZ such as Auckland.

4.3..2. The practise of building dry stones walls was mainly undertaken to;

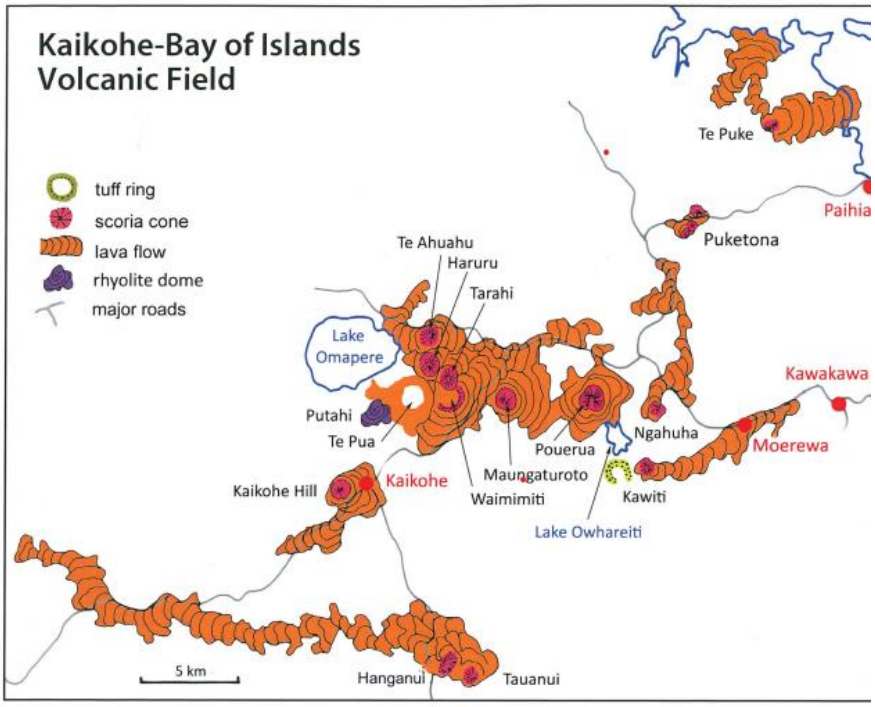
- clear land for pastural farming (as the volcanic stones were scattered across new land available for farming activities),

- define property boundaries
- contain stock
- define crop growing fields
- for building construction, to a limited extent

Far North Dry-stone walls

4.3..3. Dry stone wall building was carried out under both early Māori and European land management practise. The method was used predominately throughout the 19th and the first half of the 20th century. As indicated at paragraph 366 of the 42A report, it is correct that any modern dry-stone walls are mainly built for aesthetic landscaping purposes.

However, Far North District has the oldest remaining examples of dry-stone walls in Northland. Further, they create a unique visual heritage landscape in the areas they can be found in relation to past farming practise. They can generally be found in those areas of past volcanic activity shown on the map below in the District.



from publication Stone Wall Country – The Dry-stone walls of rthe Bay of Islands and Kaikohe – Catherine Ballard (2021).

In reality, the general dry-stone wall protection rule will only have any potential impact on less the 5-10% of the District.

I note that the Pouerua Heritage Overlay lay area, including its proposed extension, does not include all the dry stonewall features found in the District. In my view it is therefore appropriate to include a general all zones rule to protect this heritage feature.

4.3..4. <u>Dry-stone walls Cultural and Historic Heritage Values.</u>

In my view the dry-stone walls found in specific locations within the Far North District meet the standard for specific attention in the PDP, in accordance with Section 6 of the RMA;

- The dry-stone walls are a significant remnant of early human settlement both for Māori and European
- The dry-stone walls are highly significant in relation to early Māori gardening practises
- The dry-stone walls are highly significant as part of the first European pastoral farming activity in New Zealand.

- The dry-stone walls have created a cultural landscape unique to these types of geological areas.

I support the response provided by my colleague Bill Edwards countering the concerns raised by the Council Planner with a general dry-stone protection rule as proposed by HNZPT. I do not believe the concerns raised are sufficiently justified or of sufficient significance to reject this proposed protection mechanism.

4.3..5. Planning Framework

I am aware that similar dry volcanic stone wall features can be found in the adjoining Whangarei District. The Whangarei District have identified and protected these walls through the District Planning framework shown in Attachment 2. I am not aware of any particular issues arising from this approach in the Whangarei District.

In my opinion this framework directly transferable to actively manage the dry-stone wall heritage feature in the PDP, with only minor editing changes required.

4.4. **Proposed Heritage Area Overlays** (S409.034,S409.035, S409.039 - S409.049)

The s42A report writer made different recommendations for each existing overlay area. I agree the following additional areas are appropriate to be added to the PDP heritage area overlay, as they contain significant identified heritage features to adjoining or nearby to existing overlay areas. As such new property-based boundaries can be clearly defined. (See Heritage Area Maps attached as Attachment 3).

I rely on the expert evidence of my colleague, Bill Edwards, regarding the heritage significance of these additional areas and therefore provide only a few comments in this section of my evidence.

4.4..1. Proposed Extension to the Kororareka Russell Heritage Overlay Area by adding Te Maiki/Flagstaff Hill (S409.034).

The Council Planner recommended at paragraph 88 this addition be included to the extent mentioned in the gazette notice. I support this recommendation.

4.4..2. Proposed Extension to the Rawene Heritage Overlay Area by creating Part C around the Rawene Hospital site and Cemetery.

The Council Planner recommended at paragraph 131 of the Section 42a report not to include this because the hospital building itself stands alone as a private entity and upgrades might be needed in the future. I disagree with this. I think that the Council Planner may have misunderstood the intent behind the HNZPT submission in relation to this part of the additional heritage area proposed.

It is the unique use of the site as the base for an ongoing free health service that provide the cultural heritage value, not the buildings. The heritage value of the hospital site is detailed in of Bill Edward's evidence.

I advise that no restrictions on the use or redevelopment of the hospital buildings or cemetery are proposed as these are not heritage listed or scheduled under the HNZPT Act. I think that the Council Planner may have misunderstood the intent behind the HNZPT submission in relation to this part of the additional heritage area proposed.

There may be other alternative methods to recognise the cultural heritage value of the hospital site and cemetery. I confirm HNZPT are open to work further with FNDC on this.

Rawene Hospital

4.4..3. Proposed Extension to the Te Waimate Heritage Area Overlay by adding a greater pastoral farming outlook

I rely on Bill Edward's evidence on the heritage value of Te Waimate.

The Council Planner supports this addition. I support this recommendation

4.4..4. Proposed Waitangi Islands Heritage Overlay Area – recognising the important role these islands played in both the arrival of Māori and Europeans to NZ.

I rely on Bill Edward's evidence on the heritage value of the Waitangi Islands. The Council Planner supports this addition. I support this recommendation

4.5. **Proposed Heritage Alert Layer Areas**

At paragraphs 58 and 60, the Council Planner has rejected HNZPT's submission for proposed new additional heritage areas because;

- of the unclear spatial extent of the HNZPT submission
- unclarity on what HA chapter provisions would apply for new overlay
- and the landowners did not have opportunity to submit and become involved in this process.

In response I provide additional maps to provide more clarity on their spatial extent (Attachment 3).

For those areas identified by HNZPT with less clearly defined property boundaries but with significant known historic heritage and cultural values, as a first step, I suggest a non-statutory heritage alert layer could be appropriate. The Heritage Alert Layer tool, while non-statutory, would provide another source of information to landowners and developers on the heritage values that may exist on their site of interest. If alerted, a landowner or developer can then content HNZPT to get further information on any likely impacts or features they should be aware of when using their land.

A similar Heritage Alert layer tool is used in the Gisborne District planning framework (see Attachment 1). The use of this tool can be referenced and explained in the Heritage Chapter Overview section of the PDP. The Alert Layer could be added to the FNDC GIS mapping tool to provide that "heads up" to landowners and developers.

4.5..1. Proposed Oruru Valley Heritage Alert Area

The Oruru valley has over 40 identified, to date, pa sites within one valley system. This is the highest concentration of pa within a small clearly defined geographical area in Aotearoa/New Zealand. Archaeological Research and reporting and geographical mapping of cultural values located within this valley and its surrounds would be extremely expensive and time consuming. I therefore propose that the area be identified within a non-statutory Heritage Alert layer to provide some recognition and greater public awareness of this significant resource.

4.5..2. Proposed Kawakawa Township Heritage Alert Area

Kawakawa has a rich built history that includes early and modern structures including the Category 1 Hundertwasser Public Toilets and the railway network running down the main street. I rely on Bill Edward's evidence in terms of heritage value of the abovementioned structures.

Without undertaking a level of assessment required to support a heritage overlay area I support using a non-statutory Alert layer to recognise and raise public awareness of these heritage values within the Kawakawa township.

4.5..3. Proposed Kaeo Township Heritage Alert Area

The settlement of Kaeo has a rich heritage history as it was one to the earliest European settlements in New Zealand and the first Wesleyan mission site. It also has a long history of Māori settlement.

Without undertaking a level of assessment required to support a heritage overlay area I support using a non-statutory Alert layer to recognise and raise public awareness of these heritage values within the Kaeo township. I rely on Bill Edward's evidence in terms of heritage values discussed above.

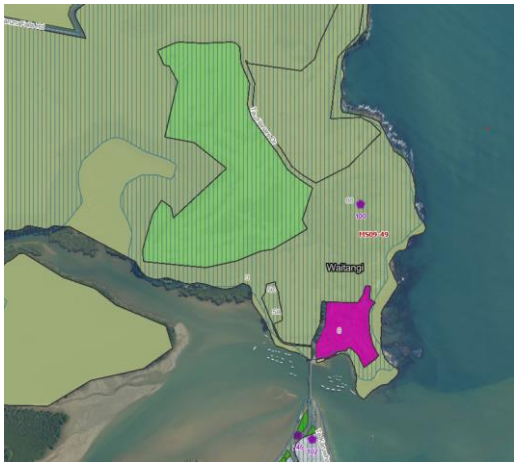
4.5..4. Proposed Waitangi Heritage Overlay Area or Special Purpose Zone

The Council Planner has recommended to defer HNZPT's submission point on Waitangi until Hearing 15B to allow a Special Purpose Zone to be developed for Waitangi. This is based on the Waitangi National Trust submission. I confirm HNZPT supports this approach.

In my view, the Waitangi Treaty site and its associated lands (provided for the specific purpose of economically supporting the ongoing maintenance and protection of the Treaty site by Governor Bledisloe in the 1930's), needs a Heritage Area Overlay or Special Purpose Zone. The sites listed under the HNZPT Act do provide protection for the key structures such as the Treaty House and Flagstaff, but not for the wider Waitangi National Trust sites supporting the ongoing protection and maintenance of Waitangi.

I consider that the current PDP land management zoning of Rural Production, even with coastal and other overlays, is inappropriate because

- It does not recognize the national historical and cultural heritage significance of Waitangi
- And it does not recognize the unique relationship of all the Waitangi National Trust land holdings to the long-term protection and maintenance of Waitangi. – see the map from the PDP below.



The site and surrounds have highly significant heritage values for both European and Māori including;

- The birthplace of the modern New Zealand nation with the signing of the Treaty of Waitangi,
- Currently the only site in New Zealand given a National Landmark Status under the HNZPT Act
- A significant sacred and ancestral landscape for Ngapuhi,
- The historical Treaty house building,

- Trees planted by a range of dignitaries over the past 100 years or more,
- The flagstaff structure,
- The Hobson Memorial.
- A place of national celebration and political meeting and discussion (Waitangi Day).

I am aware Heritage New Zealand Pouhere Taonga is working with the Waitangi National Trust and FNDC planners to develop a Special Purpose Zone for this area. I support this outcome.

However, should discussions on creating a Special Purpose Area not reach a successful outcome as part of the PDP process I still support creating a Heritage Overlay area over, at least, the treaty grounds. This should be the minimum District Planning response to the highly significant heritage values of Waitangi.

4.6. I note the Council Planners report (Section 376) recommends rejecting the HNZPT suggestion the ARCHsite information be added as a layer to the FNDC GIS system. I disagree as in my view,

- adding this layer would further help raise public awareness of potential of archaeological features before any destruction.
- while the ARCHsite is an indicative mapping tool this is sufficient to provide a warning.
- While the ARCHsite layer would not be actively updated on the Council GIS system it can be updated on a yearly basis for example, as the GIS system is non-statutory.

I therefore recommend that the ARCHsite layer be added to the Council GIS system to further support the protection and management of archaeological sites throughout the District.

5. CONCLUSIONS

5.1. Heritage is integral to the identity of a nation or local area. It is important for economic, social and cultural well-being, providing a sense of place. New Zealand's historic heritage is the whenua, places and objects that define who we are as New Zealanders, within our iwi, hapū and hapori (communities).

5.2. Our distinctive heritage, within the New Zealand and world context, is finite and irreplaceable taonga that is widely valued, but will be lost without protection.

5.3. The Far North District contains a concentration of some of the most important nation building historic heritage that remains within New Zealand which are integral to the Northland cultural heritage.

5.4. In my opinion, the HNZPT submission points I have focused on and s42A Planners recommendations that align with what was submitted, will achieve the purpose of the RMA and more specifically will recognise and provide for the protection of historic heritage from inappropriate subdivision, use, and development.

Stuart Bracey

Northern Region Heritage Planner

Heritage New Zealand Pouhere Taonga

Attachment 1: Gisborne District Heritage Alert Layer Tool

The Tairwhiti Resource Management Plan (Gisborne District Council)

Gisborne district has a wealth of heritage both pre and post European contact. This resource provides an identity unique to the people of the Gisborne district and should be recognised and protected. The management of our heritage implies a duty of care and responsibility to pass it on to future generations with the least possible loss.

The cultural heritage resource consists of the following:

- *Archaeological sites (pre and post European contact).*
- *Waahi tapu and waahi tapu areas (pre and post European contact).*
- *Heritage buildings, places and precincts (post European contact). The tools for recognition and protection of cultural heritage are primarily:*
- *a predictive model of human settlement (a heritage alert overlay), accompanied by:*
- *a schedule of archaeological sites obtained from a variety of sources including: - Heritage New Zealand Register of Archaeological Sites. - New Zealand Archaeological Association (NZAA) database of recorded archaeological sites and from information obtained from privately commissioned archaeological surveys.*
- *a waahi tapu and waahi tapu area schedule; and*
- *a schedule of post European contact historic areas, places and precincts including a Central Business District Schedule*

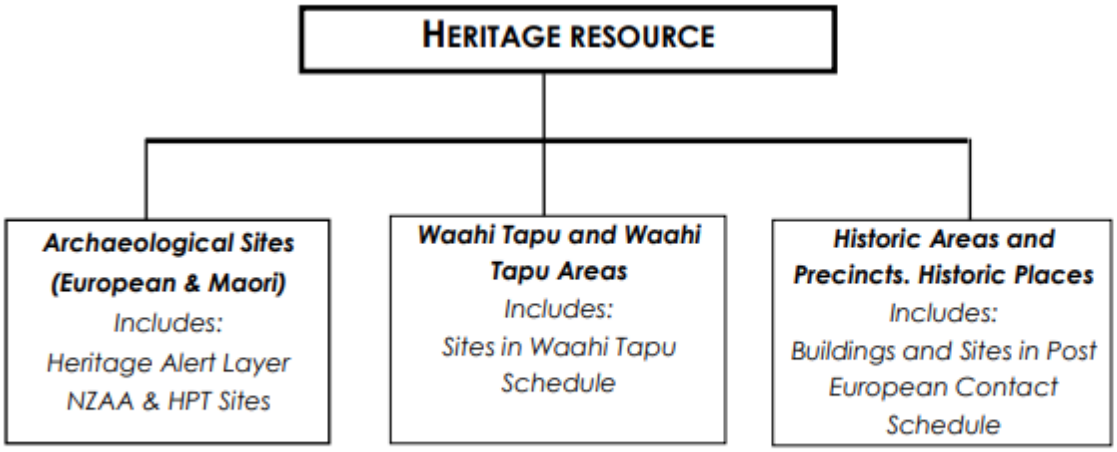


Figure C4.1 – Heritage Layers

Historic and Cultural Heritage

- Archaeological Site
- Archaeological/Waahi Tapu Site
- Waahi Tapu Site
- Archaeological Buffer - 10
- Archaeological Buffer - 15
- Archaeological Buffer - 20
- Archaeological Buffer - 30
- Archaeological Buffer - 50
- Archaeological Buffer - 70
- Archaeological Buffer - 100
- Archaeological Areas
- CBD Schedule - Historical Buildings
- Post European Contact Schedule - Historic Sites
- Heritage Precinct
- Waahi Tapu Areas
- Heritage Alert Overlay

Attachment 2: Operative Whangarei District Plan – Dry Stone Wall Protection Provisions

Operative Whangarei District Plan

Objective HH-BH-03 of the WDC District Plan Historical Heritage Section states.

HH-BH-O3Dry Stone Walls

Dry stone walls of historic, cultural, amenity and landscape value to the community are maintained and protected throughout the district.

Policy HH-BH-P11 Dry Stone Walls states

HH-BH-P12Dry Stone Walls

To protect dry stone walls of historical, cultural and amenity value to the community through:

1. *Blanket protection of dry stone walls throughout the District.*
2. *Providing information and advice to the public, including Geographic Information Systems information on the location of protected dry stone walls.*
3. *Discouraging planting close to dry stone walls.*
4. *Encouraging proactive maintenance, for example repair of capping stones*.
5. *Recommending consultation with Heritage New Zealand where dry stone walls are estimated to have been constructed prior to 1900 or their age is in doubt.*
6. *Limiting works affecting existing dry stone walls, other than:*
    a. *Repairs or maintenance in situ using traditional methods, design and materials.*
    b. *Removal of up to 6m length of wall for access purposes only, where no alternative access exists.*

The only District Plan rule directly attached to drystone walls is;

HH-BH-R3Works to Existing Dry Stone Walls

All Zones

Activity Status: Permitted

Where:

1. *The works are for:*

a. *Repairs or maintenance in situ using traditional methods, design and materials.*

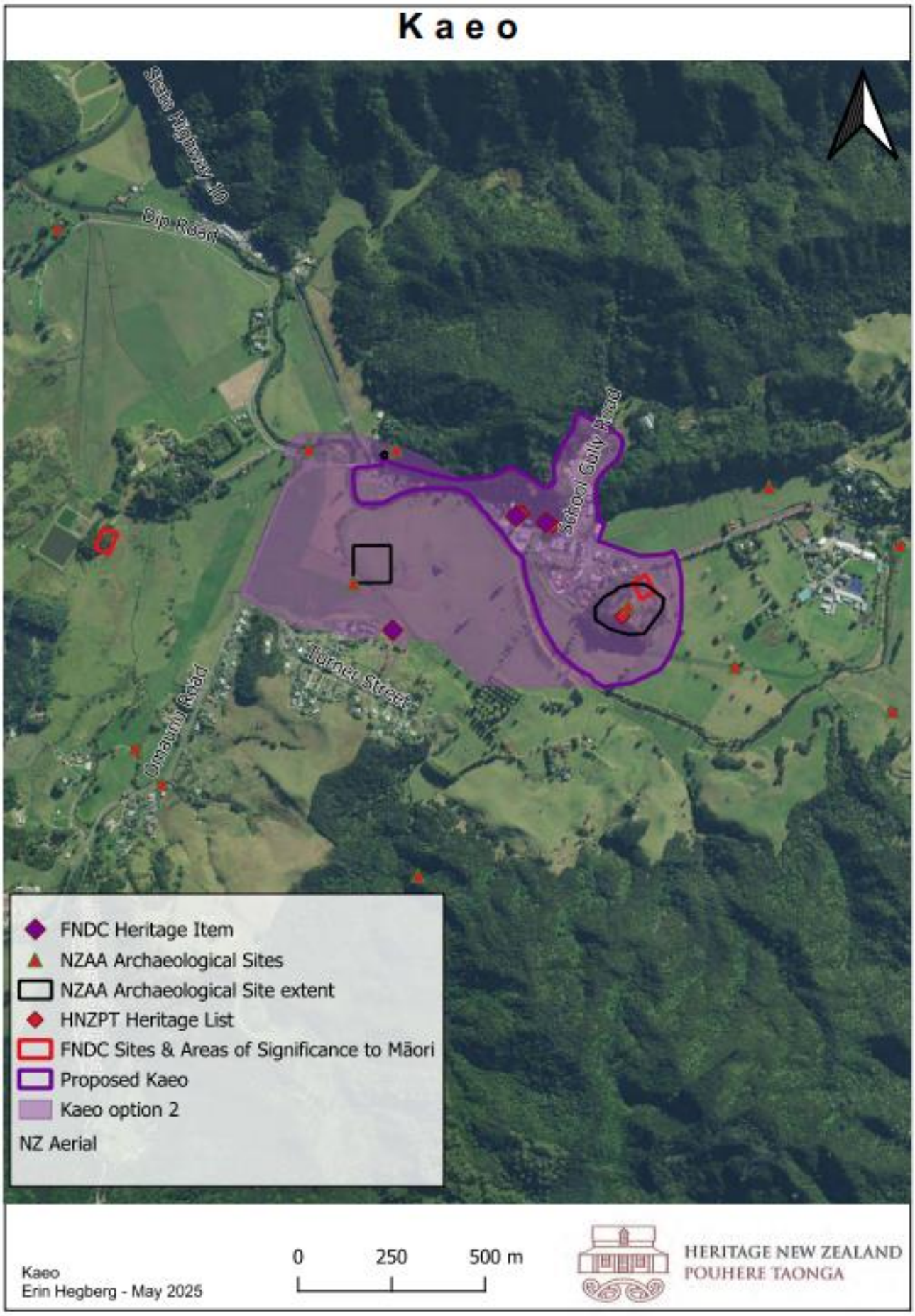
b. *Removal of up to a total 6m length of wall per site for access purposes only, where no alternative access exists.*

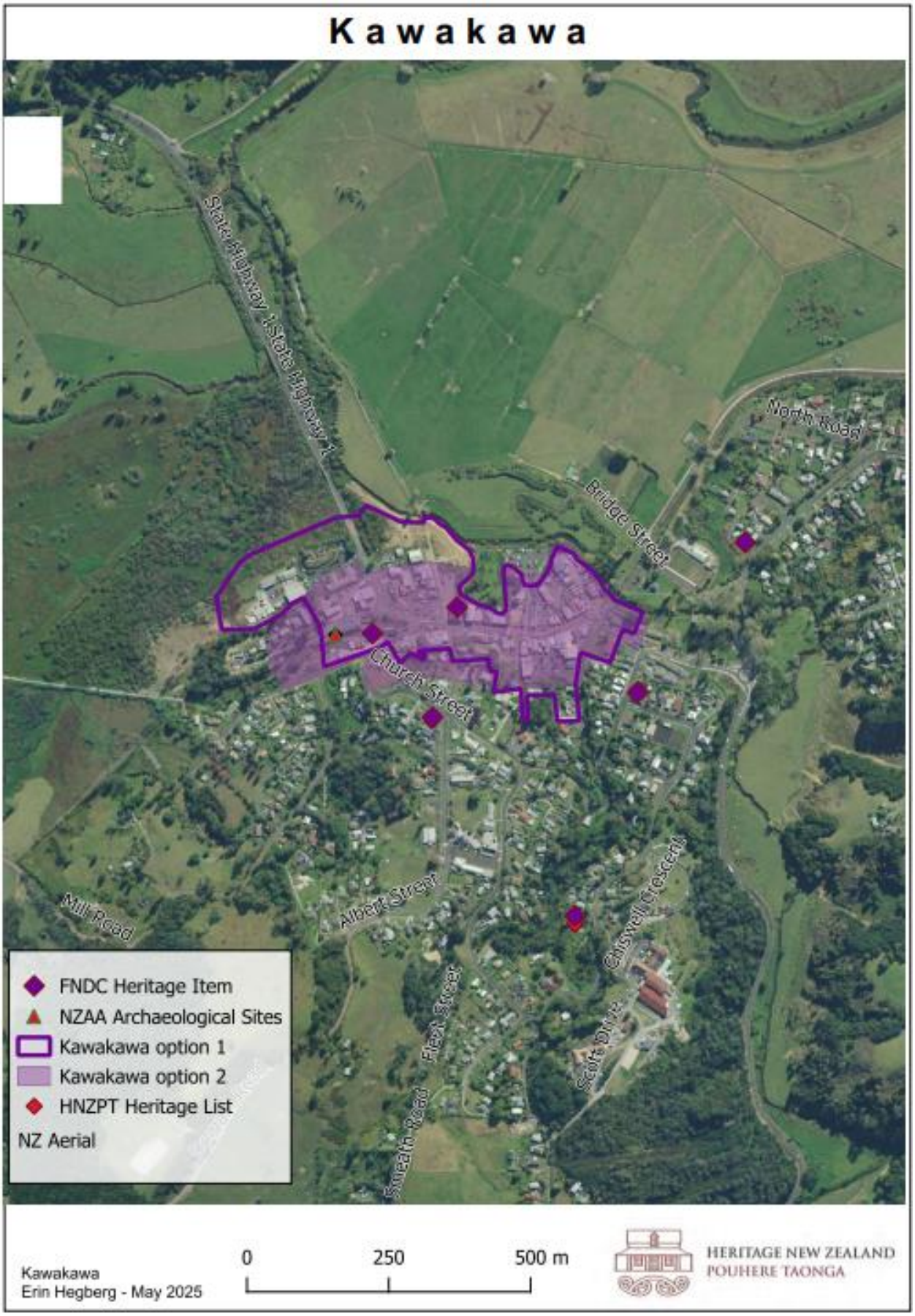
Activity Status when compliance not achieved: Discretionary

The following Definition is used for dry stone walls in the Whangarei District Plan.

Dry Stone Wall	*This definition only applies to the Historical Heritage Chapter of the District Plan.* means a wall that has been constructed by hand, without mortar, from locally sourced volcanic rocks, as opposed to man-made construction materials. Located primarily within the areas of Maungatapere, Maunu, Glenbervie, Three Mile Bush and Maungakaramea, these walls were generally constructed between the 1850's and World War II. Pre -1900 dry stone walls are also classed as 'archaeological sites'.

Attachment 3: Maps of Additional Heritage Areas


Kaeo
State Highway 10
Dip Road
School Gully Road
Turner Street
Puketona Road
FNDC Heritage Item
NZAA Archaeological Sites
NZAA Archaeological Site extent
HNZPT Heritage List
FNDC Sites & Areas of Significance to Māori
Proposed Kaeo
Kaeo option 2
NZ Aerial
Kaeo
Erin Hegberg - May 2025
0
250
500 m
HERITAGE NEW ZEALAND
POUHERE TAONGA


Kawakawa
State Highway 1/State Highway 1
North Road
Bridge Street
Church Street
Albert Street
Mill Road
Caldwell Crescent
Scott Drive
Flett Street
Kawakawa option 1
Kawakawa option 2
FNDC Heritage Item
NZAA Archaeological Sites
HNZPT Heritage List
NZ Aerial
0
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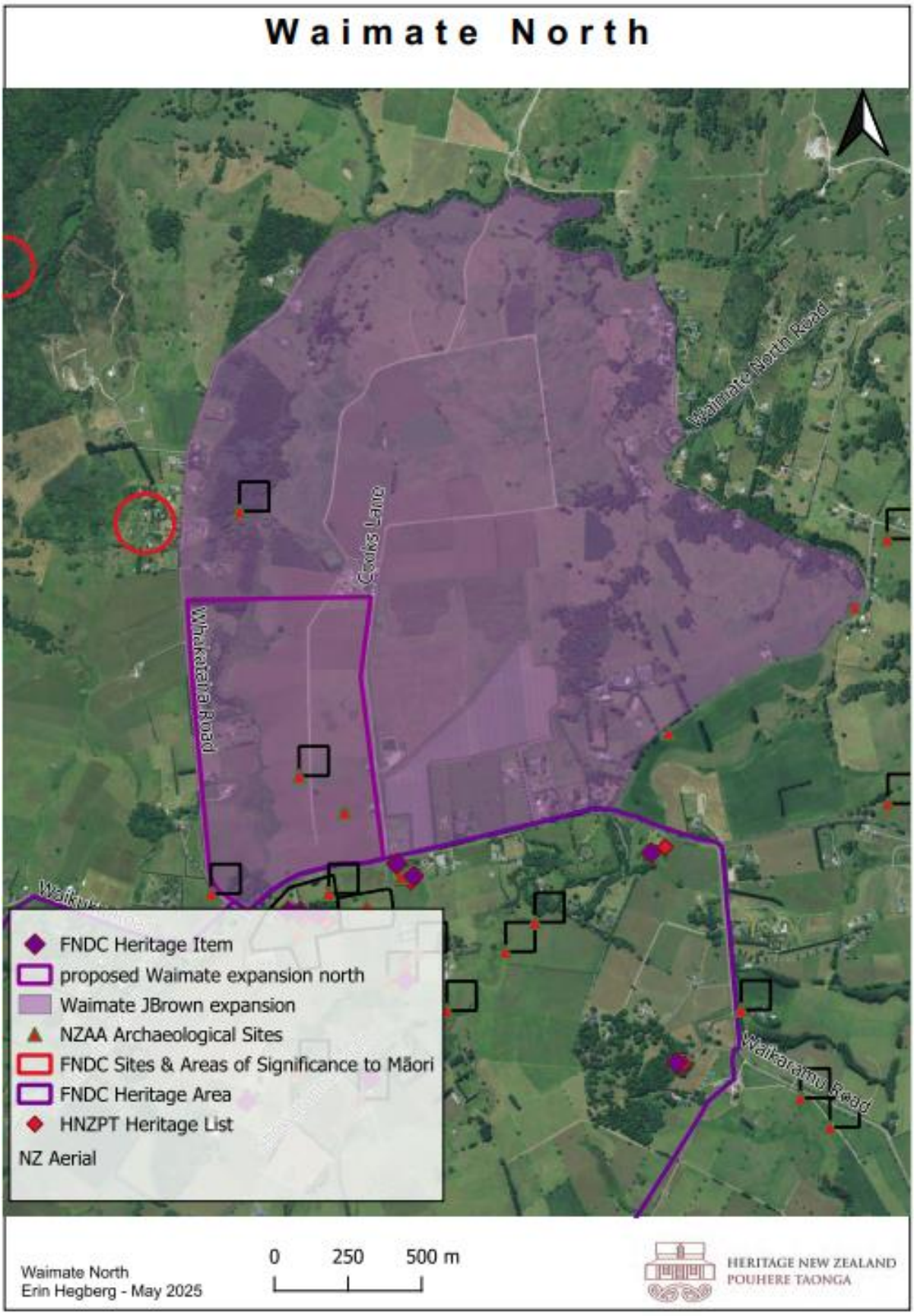
500 m
Kawakawa
Erin Hegberg - May 2025
HERITAGE NEW ZEALAND
POUHERE TAONGA

Rawene

Rawene
Erin Hegberg - May 2025

HERITAGE NEW ZEALAND
POUHERE TAONGA


Waimate North
Waimate North Road
Cooks Lane
Whakatāra Road
Waikaramu Road
FNDC Heritage Item
proposed Waimate expansion north
Waimate JBrown expansion
NZAA Archaeological Sites
FNDC Sites & Areas of Significance to Māori
FNDC Heritage Area
HNZPT Heritage List
NZ Aerial
Waimate North
Erin Hegberg - May 2025
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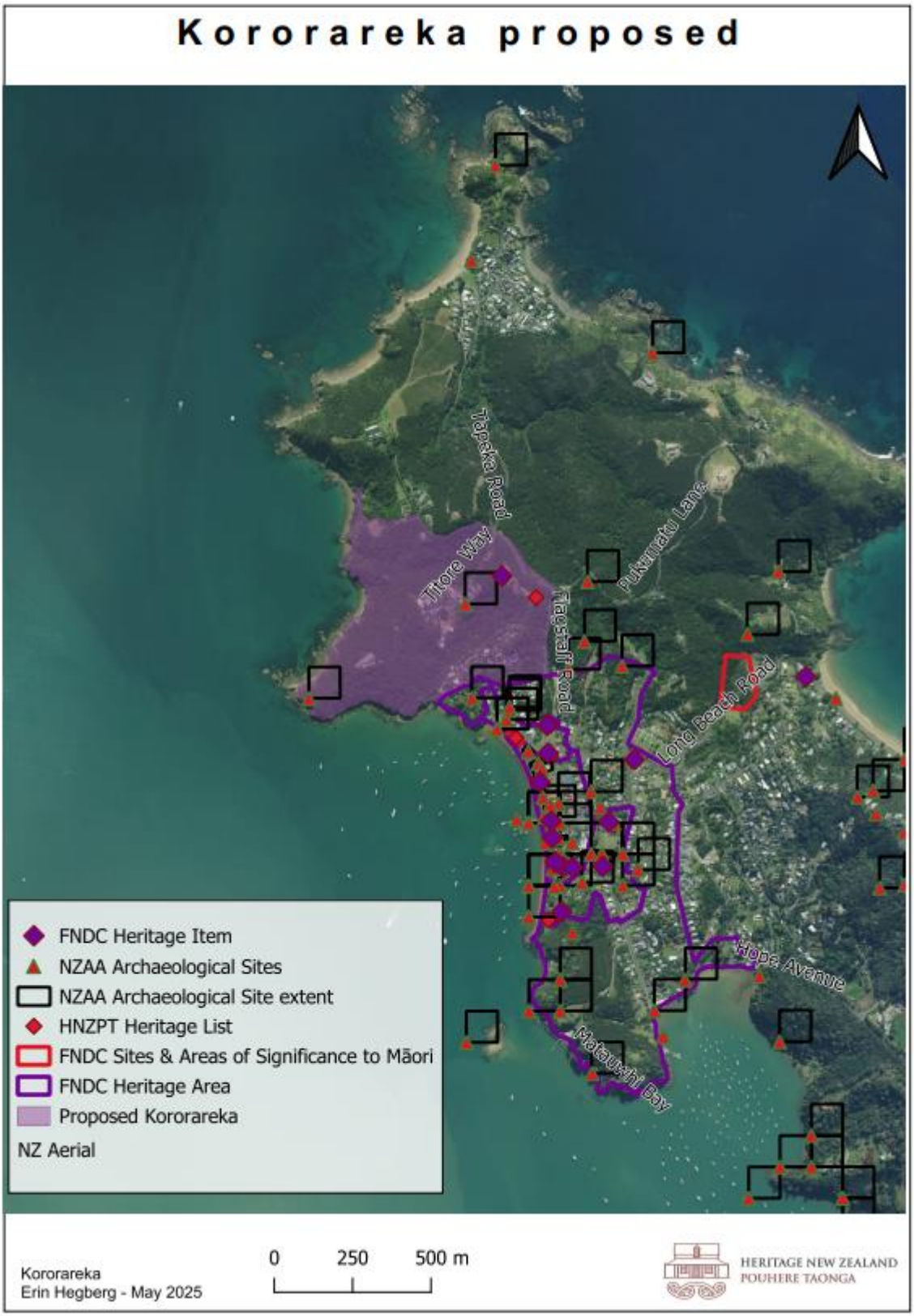
HERITAGE NEW ZEALAND
POUHERE TAONGA


Kororareka proposed
Tapeka Road
Titore Way
Pukeruatu Lane
Flagstaff Road
Long Beach Road
Hope Avenue
Matauwhi Bay
FNDC Heritage Item
NZAA Archaeological Sites
NZAA Archaeological Site extent
HNZPT Heritage List
FNDC Sites & Areas of Significance to Māori
FNDC Heritage Area
Proposed Kororareka
NZ Aerial
Kororareka
Erin Hegberg - May 2025
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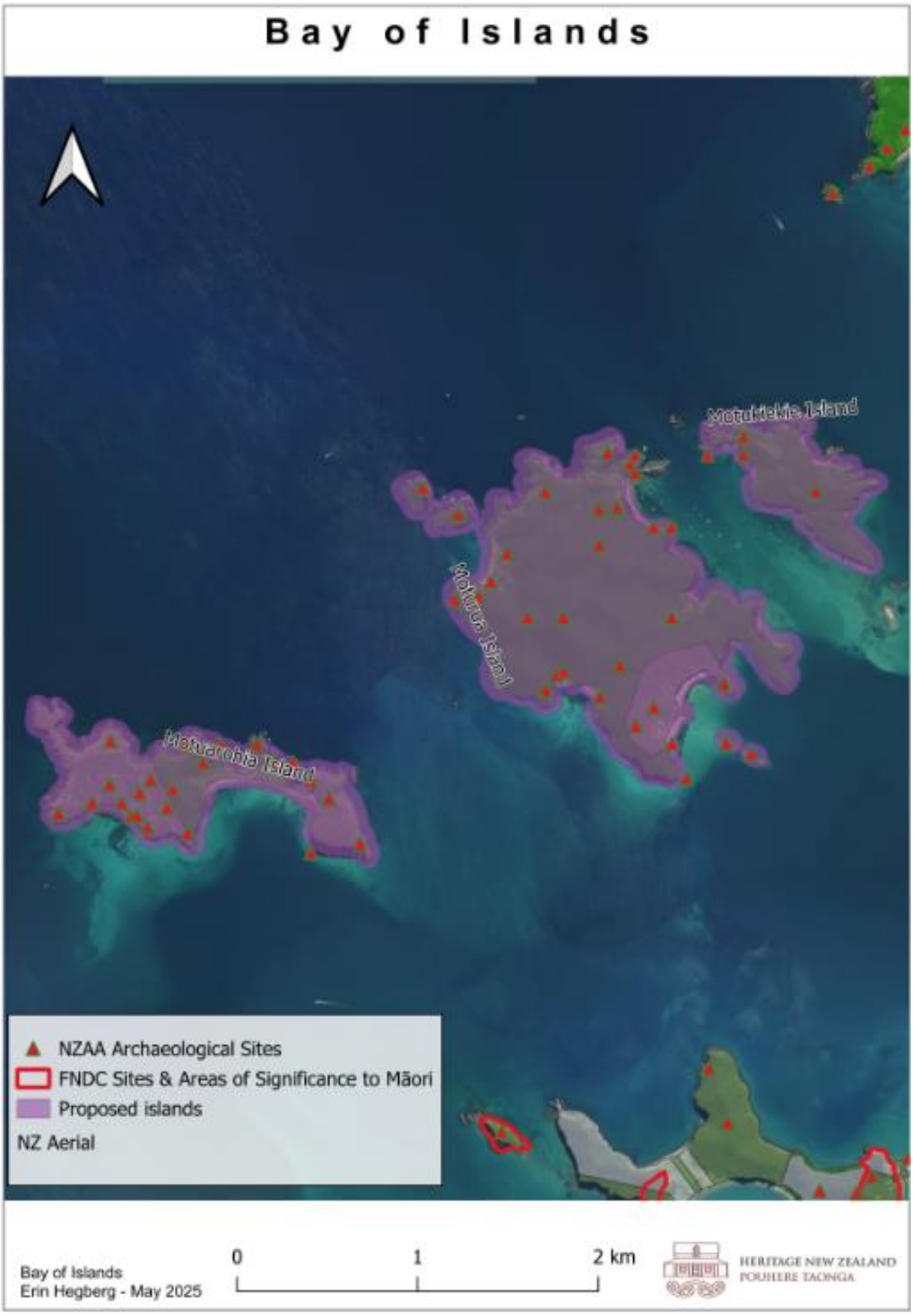
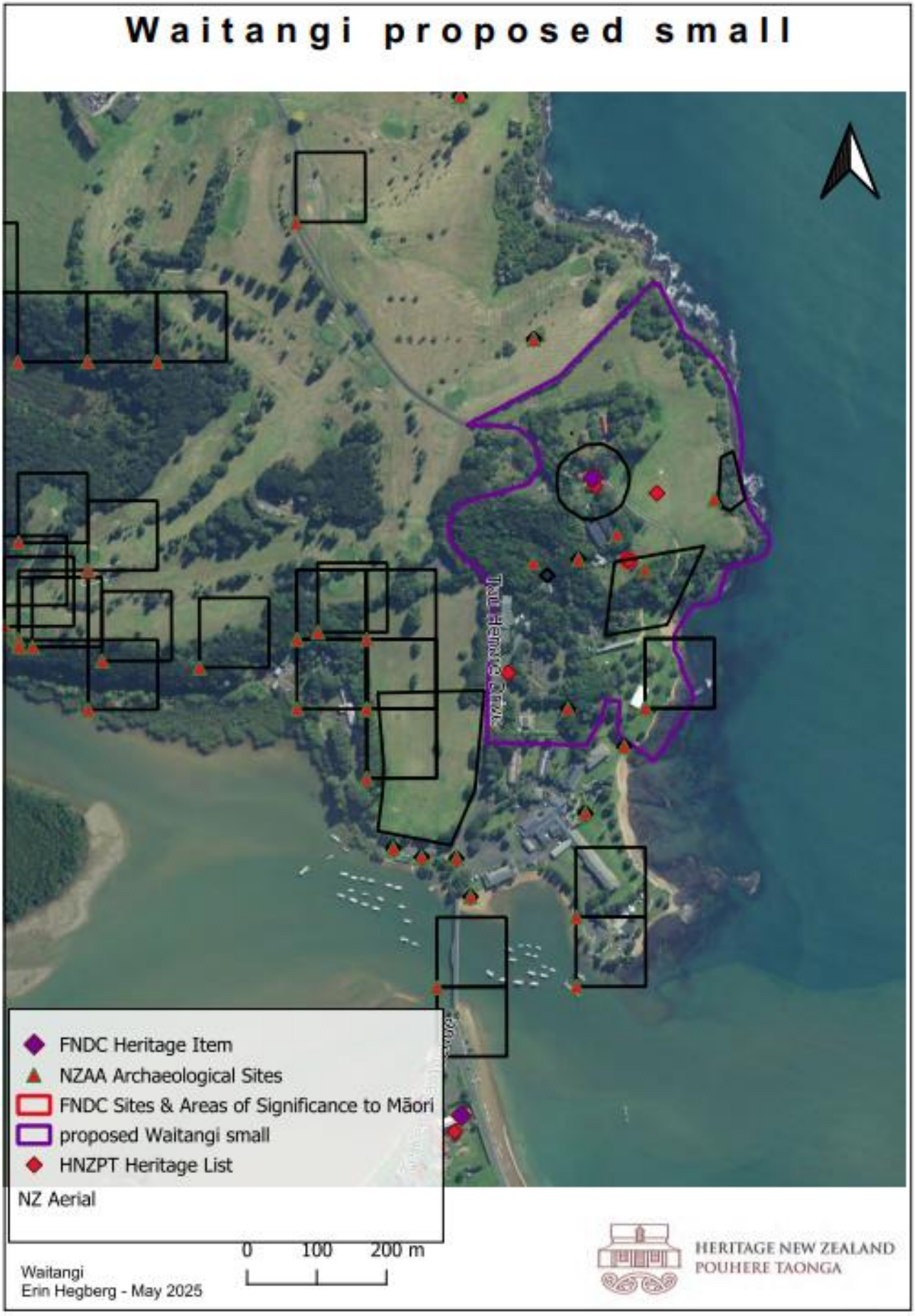
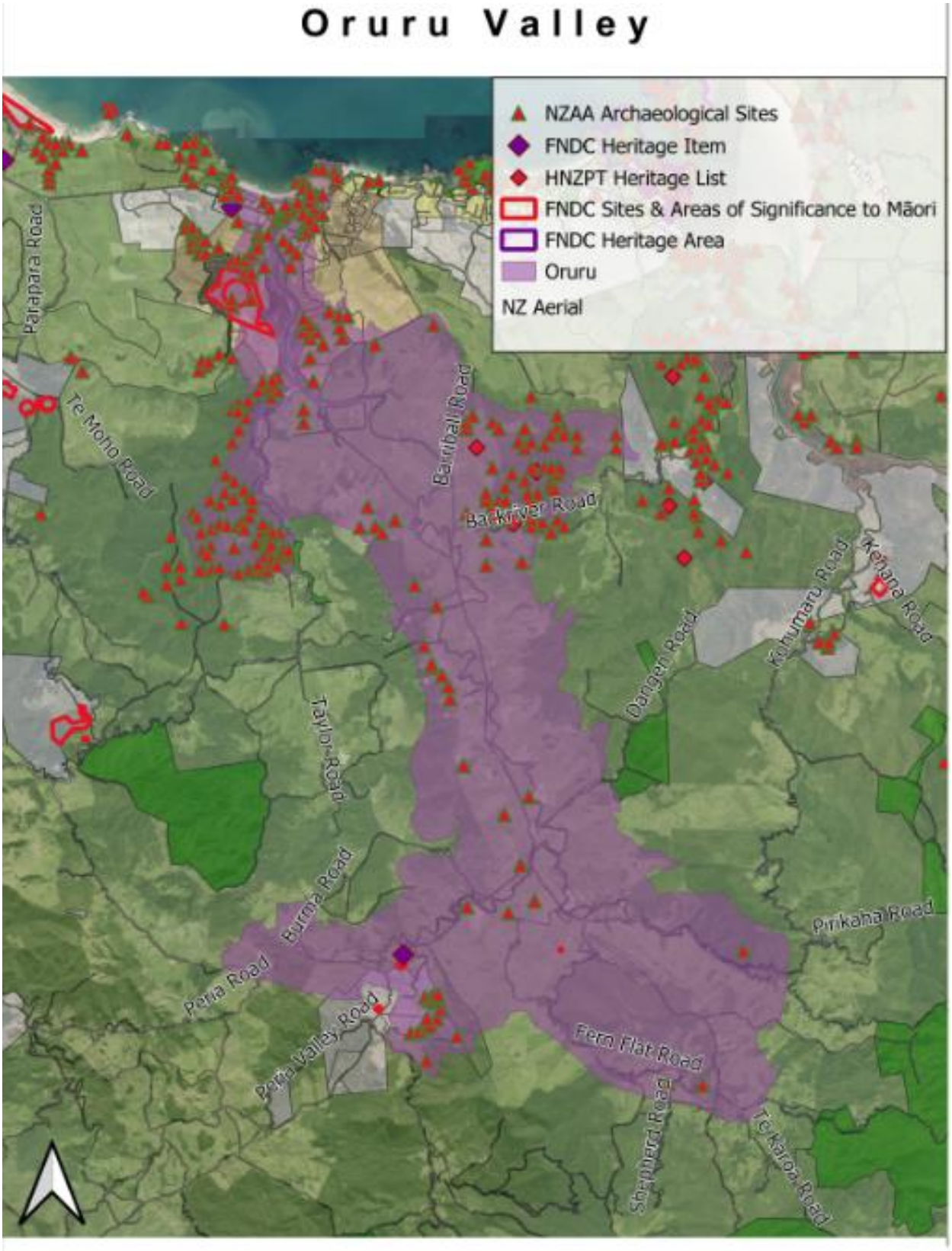
HERITAGE NEW ZEALAND
POUHERE TAONGA


Bay of Islands
Motukiekie Island
Moturua Island
Motuarohia Island
NZAA Archaeological Sites
FNDC Sites & Areas of Significance to Māori
Proposed islands
NZ Aerial
Bay of Islands
Erin Hegberg - May 2025
0
1
2 km
HERITAGE NEW ZEALAND
POUHERE TAONGA


Waitangi proposed small
FNDC Heritage Item
NZAA Archaeological Sites
FNDC Sites & Areas of Significance to Māori
proposed Waitangi small
HNZPT Heritage List
NZ Aerial
0
100
200 m
Waitangi
Erin Hegberg - May 2025
HERITAGE NEW ZEALAND
POUHERE TAONGA

Oruru Valley



Heritage Area Boundary Rationale

Heritage area	Boundary rationale
Kaeo option 1 (smaller)	Boundaries follow river and buffer around Pā (southern boundary), zones and topography (northern boundary)
Kaeo option 2 (larger)	Expanded to west and south to include archaeological sites and heritage features mentioned in initial HNZPT submission. Area along School Gully Road follows topographic lines and vegetation changes.
Kawakawa option 1 (larger)	Follows FNDC zone boundaries (mixed use zone)
Kawakawa option 2 (smaller)	Hybrid of 50 m buffer on rail line through central Kawakawa, with allowances for property lines, buildings, and waterways.
Kororāreka	Uses FNDC zones for coastline, southern boundary, Flagstaff Road for eastern boundary, property lines for northern boundary.
Oruru	Ridgelines, Oruru watershed (especially for Fern Flat section), topographic lines, mapped site density from NZAA and Johnson 1986
Rawene	Follows property boundaries along cemetery and hospital. Encompasses Barnell Street and street-shaped parcel on east side of cemetery reserve.
Waimate North option 1 (smaller)	Area indicated by initial HNZPT submission
Waimate North JB option (larger)	Used Section 42A report maps
Waitangi option 1 (smaller)	Follows extend of National Landmark.
Waitangi option 2 (larger)	Follows FNDC zones for southern and eastern coastline, property boundaries for western and northern boundaries, aims to encompass high density of recorded archaeological sites in area.
Islands (Motuarohia, Moturua, Motukiekie)	Uses FNDC zones to establish coastline, then a 50 m buffer added to accommodate intertidal zone and potential marine archaeology