

Chapter 10: Heritage Resources and Notable Trees

Draft Marlborough Regional Policy Statement Provisions

Draft

Introduction

“We are what we are as a result of the past”. Regardless of who we are or what our cultural background is, how Marlborough has developed is an important part of our collective heritage.

Historic heritage includes those natural and human made features of the landscape which combine to give people a sense of place and are valued for providing a connection with our past. Heritage resources include historic buildings, places and sites; heritage trees, places or sites of significance to Marlborough’s tangata whenua iwi; and archaeological sites. These resources collectively contribute to environmental quality and community wellbeing in many ways.

Within Marlborough there is a variety of important heritage resources reflecting a rich and varied cultural history. This includes a long history of occupation by Maori and a legacy left by early exploration (e.g., Cook’s visits), settlement and extractive industries, including agriculture, flax milling, logging, mining and whaling. What is exciting about Marlborough, in the heritage sense, is the number of New Zealand firsts and the diversity of heritage resources. While there may be more iconic heritage examples in other parts of New Zealand, Marlborough possibly contains the best overall combination of sites with historic heritage value. Some of Marlborough’s heritage resources are nationally significant, such as the history of Maori occupation at the Wairau Bar or the ship Edwin Fox in Picton Harbour. Many other heritage resources will either be significant for the District or for local communities. Sites of historical or cultural value are also becoming increasingly important as tourism in Marlborough grows, bringing with it the advantage for commercial support for enhancement of historic heritage.

Most people wish to retain the heritage of the past, not only for themselves but also for those generations to come. Protection of heritage resources is one of the duties of stewardship which the Council accepts as being essential for the District.

Heritage New Zealand is the agency that manages heritage resources on a national basis. This autonomous Crown Entity administers the New Zealand Heritage List/Rārangi Kōrero, which informs property owners and the public about New Zealand’s historic places. It also investigates and processes proposals for new listings on the List. It is important to note that Heritage New Zealand retains regulatory responsibilities regarding archaeological sites. Any destruction, damage, or modification of a known or unknown archaeological site requires an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 and Heritage New Zealand processes applications for such authorities.

The protective mechanisms for places or sites listed on the List are administered by local authorities through district plans prepared under the RMA. This reflects Sections 6(f) of the RMA which requires the Council to recognise and provide for protection of historic heritage from inappropriate subdivision, use and development. Local authorities can also protect unregistered heritage resources that are significant to the District, or to local communities within it.

Indigenous biodiversity is also a heritage resource. Habitats of indigenous fauna and areas of indigenous flora make a significant contribution to Marlborough’s unique natural heritage. However, protecting and maintaining indigenous biodiversity is a significant issue in its own right and has been dealt with in Chapter 8 of the RPS/Resource Management Plan.

Issue 10A – Marlborough’s historic heritage may be lost or adversely affected by changes in land use and land use management practices.

Marlborough’s historic heritage is vulnerable to the use and development of natural and physical resources. Changes brought about as a result of resource use can involve the demolition, relocation or modification of heritage resources. These changes have the significant potential to either completely eliminate or otherwise reduce the historic heritage values of the heritage resource.

Archaeological sites are particularly vulnerable to land disturbance. This is because they tend to be buried and excavation at, or in close proximity to the site, can unearth the object of significance. If appropriate action is not taken, the heritage resource that was previously buried can potentially be

damaged or destroyed. For archaeological sites that have a connection to Marlborough's tangata whenua iwi, such adverse effects can also cause a serious cultural affront to the mana of an iwi.

One of the threats to historic heritage is that there are many unknown areas of heritage significance. For example, although past archaeological studies have revealed a little of the Maori and early European settlement patterns and culture, much more remains to be identified, researched and recorded. There will also be forgotten sites. The lack of awareness of the existence of a heritage resource makes the resource vulnerable to irreparable damage as a result of land use change.

Managing environmental change is a significant challenge as it involves recognising the needs of the community to develop and grow, while ensuring that heritage resources are retained for present and future generations. Protection of heritage resources does not necessarily mean that the heritage resource cannot be developed. Some heritage resources, such as buildings, may be able to be reused or redeveloped in a way that enhances the heritage value. Intervention, in the form of alteration or addition, may also be required to actively protect the heritage resource. It is important to acknowledge that it can be difficult to balance safety objectives, especially in terms of fire and earthquake, with the retention of historic buildings. The earthquake risk presented by some historic buildings has resulted in their demolition in the past. Heritage resources can also be vulnerable because of a lack of care and maintenance.

Objective 10.1 – Retain and enhance heritage resources that contribute to the character of Marlborough.

Historic heritage makes a significant contribution to the identity of the District and provides us with a sense of place. In doing so, historic heritage adds to the social and cultural wellbeing of our community. It is therefore important for heritage resources to be retained. Retention of heritage resources does not necessarily ensure their protection as many heritage resources, especially buildings, need to be maintained on an ongoing basis given their age. Where maintenance has not occurred or where past development has not taken into account a resource's heritage values, heritage resources may need to be actively enhanced. Any enhancement of heritage resources will improve the contribution they currently make to our social and cultural wellbeing. This objective also reflects the Council's obligations under Sections 6(e) and 6(f) of the RMA.

Policy 10.1.1 – Provide appropriate protection to Marlborough's heritage resources, including:

- (a) Historic buildings (or parts of buildings), places and sites;**
- (b) Heritage trees;**
- (c) Places of significance to Marlborough's tangata whenua iwi;**
- (d) Archaeological sites; and**
- (e) Monuments and plaques.**

This policy sets out those things considered to be heritage resources in a Marlborough context, all of which make a significant contribution to our historic heritage. The policy also establishes a course of action that, in order to achieve Objective 10.1, these heritage resources should be protected. Protection in this context should be considered in a broad way. It includes the use of rules, so that the adverse effects of the demolition, relocation or modification of heritage resources can be considered through the resource consent process, but it may also include things such as the use of heritage protection orders (legal protection), provision of assistance to undertake physical protection works, assistance for other heritage protection agencies and acting to improve the community's awareness of heritage resources etc. The use of "appropriate" in the policy reflects the diversity of protection methods.

Note that the protection of heritage trees has been combined with the protection of trees that have amenity significance. See provisions under Objective 10.2 below.

Chapter 10: Heritage Resources and Notable Trees

Policy 10.1.2 – Manage Marlborough’s heritage resources in association with Heritage New Zealand, the Department of Conservation, the Archaeological Association, Marlborough’s tangata whenua iwi, other heritage organisations, and the local community.

There are multiple agencies and groups involved in the protection of Marlborough’s historic heritage. It is important that the actions of all are co-ordinated to ensure integrated management of heritage resources. This means that it is important that there are positive relationships between these agencies and groups. This policy signals that the Council will actively involve a wide range of groups and organisations managing Marlborough’s heritage resources.

Policy 10.1.3 – Support community initiatives to retain and enhance heritage resources.

Local communities can initiate projects to retain and enhance heritage resources. The Council will support such proactive efforts as an effective way of not only protecting Marlborough’s historic heritage, but also creating a community awareness of this heritage.

Policy 10.1.4 – Except as provided for by Policy 10.1.6, primarily rely on Heritage New Zealand and the requirements of the Heritage New Zealand Pouhere Taonga Act 2014 to regulate publicly known archaeological sites within Marlborough.

There are dual management responsibilities for the management of historic heritage in New Zealand with both Heritage New Zealand and local authorities involved, especially for archaeological sites. Given the specific regulatory protection provided to archaeological sites through the Heritage New Zealand Pouhere Taonga Act 2014, the Council considers it to be an inefficient use of resources to create a dual consenting process. An additional consenting process under the RMA would provide no measurable additional protection of the archaeological site. Archaeological sites are important in a Marlborough context and the Council will actively support Heritage New Zealand’s regulatory protection of these sites through the provision of a range of non-regulatory methods and in the processing of resource consent applications.

Policy 10.1.5 – Liaise with Heritage New Zealand, the Archaeological Association and Marlborough’s tangata whenua iwi to develop and implement an appropriate discovery protocol for archaeological sites.

Given the long history of Maori and more recent European settlement in Marlborough, it is likely that there are many unrecorded archaeological sites beneath the ground. Such sites can be unearthed as a result of land disturbance activities. There are legal requirements under the Heritage New Zealand Pouhere Taonga Act 2014 that apply in such circumstances. However, the person undertaking the work may not be familiar with these requirements or that the site is of significance as an archaeological site. For this reason, the Council will liaise with Heritage New Zealand, the Archaeological Association and Marlborough’s tangata whenua iwi to establish protocols to guide appropriate action in the event of a discovery of an archaeological site. These protocols will be published and provided to the community.

Policy 10.1.6 – Control land disturbance activities in places of significance to Marlborough’s tangata whenua iwi.

Policies 10.1.4 and 10.1.5 guide how the Council will assist to protect archaeological sites in Marlborough. Maori occupation of Marlborough in the past was extensive. This means that not all sites of spiritual or cultural significance to Marlborough’s tangata whenua iwi will be known and/or recorded. It also means that the significance cannot necessarily be attributed to a discrete site. For this reason, the policy applies to “places” of significance. Land disturbance within these places is to be controlled through regional and district rules so that the potential impact of excavation, filling or vegetation removal on the mana of the relevant iwi can be assessed. This will enable the iwi to exercise kaitiakitanga through involvement in the resource consent process as affected parties.

Policy 10.1.7 – Increase the community’s awareness of historic heritage values by identifying heritage resources, including historic buildings, places, sites, monuments and plaques that meet the following criteria for significance in the RPS/Resource Management Plan:

- (a) Have value as a local landmark, over a significant length of time;

- (b) Have historic association with a person or event of note, or has strong public association for any reason;
- (c) Reflect past skills, style, materials, methods of construction, or workmanship which would make it of educational or architectural value;
- (d) Is unique or rare in relation to particular historical themes, or is a work of art;
- (e) Is important to Marlborough's tangata whenua iwi;
- (f) Forms part of a precinct or area of heritage value.

The criteria included in the policy will be used to identify heritage resources that require protection. In this way, the policy allows an inventory of heritage resources to be established. The inventory contains historic places, historic areas, waahi tapu and waahi tapu areas included in the New Zealand Heritage List/Rārangī Kōrero, Heritage New Zealand administers the New Zealand Heritage List/Rārangī Kōrero, which recognises the national significance of historic places, historic areas, wahi tapu and wahi tapu areas. The Council is required under the RMA to have regard to any entry on the List in preparing its RPS/Resource Management Plan. Heritage resources that are of local significance that meet the above criteria are also included. This inventory is included within the RPS/Resource Management Plan as a schedule in order to increase the community's awareness of historic heritage values in Marlborough.

Other heritage resources that meet the criteria of the policy can be added to the schedule over time. Any such addition must first proceed through the First Schedule process of the RMA.

Note that for historic buildings, the area around the building (called the "defined setting") may also contribute to its heritage significance. Where this is the case, it may be appropriate to also identify the surroundings as part of the heritage resource.

Policy 10.1.9 – Avoid adverse effects on the historic heritage values of Category I heritage resources.

Heritage resources sourced from the New Zealand Heritage List/Rārangī Kōrero (in accordance with Policy 10.1.8) are assigned either a Category I or Category II status. Heritage resources classified as Category I are heritage resources that are nationally significant. Any loss or damage of, or significant change to, a Category I heritage resource would result in a significant and potentially irreversible loss of historic heritage that is important in a national context... For this reason, any adverse effects on Category I heritage resources should be avoided.

Policy 10.1.10 – When assessing resource consent applications to demolish, remove, alter or add to a historic building, place, site, monument or plaque, have regard to:

- (a) The contribution the heritage resource makes to the local or national identity and sense of place;
- (b) The effect demolition, removal, alteration or additions will have on the heritage values;
- (c) The extent to which the adaptive reuse of a listed building or object enables owners of historic heritage to make reasonable and economic use of that listed building or object;
- (d) The extent to which the work is necessary to enable the continued use of the building;
- (e) The extent to which the work is necessary to ensure structural stability, accessibility, fire egress, sufficient earthquake strengthening and the extent of the impact of the work on the heritage values of the building;
- (f) Any cumulative effects, especially where the resource is part of a group of similar resources;
- (g) Efforts by the applicant to retain important features of the heritage resource;
- (h) The extent to which any alteration or addition is in keeping with the original design and materials, or otherwise enhances the heritage value of the resource;

Chapter 10: Heritage Resources and Notable Trees

- (i) The need for ongoing recognition of the significance of sites currently identified by monuments or plaques; and
- (j) Options for retaining a heritage resource when its demolition is proposed; and
- (k) For heritage resources on the New Zealand Heritage List/Rārangi Kōrero, the views of Heritage New Zealand.

This policy sets out the matters that the Council should have regard to when assessing any resource consent application to demolish, remove, alter or add to a heritage resource. These matters are designed to ensure the significance of the heritage resource is recognised and appropriately provided for in the decision making process.

Policy 10.1.11 – When assessing resource consent applications to destroy or modify a registered waahi tapu site or area, or to undertake activities in a place of significance to Marlborough’s tangata whenua iwi, have regard to:

- (a) The effect demolition, removal, alteration or additions will have on the heritage values heritage resource;
- (b) The position of the relevant iwi;
- (c) The views of Heritage New Zealand;
- (d) The effects of the destruction or alteration on the heritage resource or the effects of the proposed activity on the spiritual and cultural values of iwi;
- (e) Any cumulative effects, especially where the resource or place is part of a group of similar resources or places;
- (f) Efforts by the applicant to retain important features of the heritage resource or spiritual and cultural values of iwi;
- (g) Whether the activity can be undertaken at an alternative location on the same property, or on another property owned by the applicant, where the adverse effects on the heritage resource or place can be avoided.

This policy sets out the matters that the Council should have regard to when assessing any resource consent application to destroy or modify a waahi tapu site or area, or other area of significance to Marlborough’s tangata whenua iwi. These matters are designed to ensure the cultural and spiritual significance of the site or area is recognised and appropriately provided for in the decision making process.

Policy 10.1.12 - When considering any land use consent application to use a historic building(s) identified in the RPS/Resource Management Plan, the Council may take into account the potential for the retention and/or enhancement of the building(s) that (re)use may provide.

Opportunities exist to retain and enhance historic buildings through the active use and adaptive reuse of the buildings. Where the use of a historic building is not enabled for by the relevant zone rules (i.e., a land use consent is required for the activity irrespective of the historic heritage value of the building), this policy allows the Council to take into account any positive effects of the use in terms of protecting historic heritage values in determining the application. Re-use of heritage buildings may require modification to be made to the building. This creates the opportunity for the heritage value of a historic building to be enhanced, especially where the modifications are sympathetic to, or build upon, existing heritage features.

Issue 10B – Trees that contribute to Marlborough’s historic heritage and/or amenity values are at risk of being removed or adversely affected by maintenance trimming.

Individual indigenous and exotic trees and stands of trees make a significant contribution to Marlborough’s character and the amenity values that the community enjoys. Some trees also have historic heritage significance because they commemorate an important local event, serve as an important local landmark or have an association with a well-known public figure.

The contribution that notable trees make to historic heritage and amenity would be lost if they were to be adversely affected, harmed or felled. This may occur where a notable tree has become an impediment to the use or development of a site or it might have become a nuisance (e.g., through size, blocking of sunlight or leaf fall). Ignorance of the heritage or amenity value that the community places on the tree increases the risk that it could be felled. Sometimes the removal of a notable tree is unavoidable especially if it is dying, or diseased, or creates a threat to public safety. Maintenance pruning of notable trees can also pose a threat as such work can damage the tree or adversely affect the essential qualities for which the tree is valued.

Other activities undertaken in close proximity to notable trees create the potential for adverse effects. Activities of particular concern include excavation, laying of overhead or underground services and the construction of buildings.

Objective 10.2 – Retain trees that make a notable contribution to Marlborough’s character.

Trees which have significant heritage value or make a significant contribution to the character and amenity values of an area are to be retained given the contribution that they make to our social and cultural wellbeing. The retention of such notable trees ensures that current and future generations can continue to appreciate and benefit from these trees. This objective also reflects the Council’s obligations under Sections 6(f) and 7(e) of the RMA.

Policy 10.2.1 – Increase the community’s awareness of the contribution that trees make to historic heritage and/or amenity values, by identifying trees which meet the following criteria for significance, in the RPS/Resource Management Plan:

- (a) Any tree commemorating an important local event in Marlborough’s history, settlement and development;**
- (b) Any tree that is regarded as an important landmark and has been acknowledged as such for a significant period of time;**
- (c) Any tree that has historic association with a well-known public figure or has had strong public association for some reason;**
- (d) Any rare or important species;**
- (e) Any tree that accumulates a score greater than 150 points when using the assessment system for amenity trees set out in Table X;**
- (f) A stand of trees conforming to the above.**

The criteria included in the policy will be used to identify notable trees that require protection. Criteria (a) to (c) apply to heritage trees. Criteria (e) refer to an assessment process used to evaluate the amenity significance of trees. This assessment process, set out in Table X, rates the scientific, botanic, landscape, cultural and functional value of the tree, along with its size, age, condition and setting. Trees that accumulate a score of greater than 150 are considered to be significant for amenity reasons.

The use of the criteria in the policy allows an inventory of notable trees to be established. This inventory is to be included within the RPS/Resource Management Plan as a schedule in order to increase the community’s awareness of amenity and historic heritage values in Marlborough. Other notable trees that

Chapter 10: Heritage Resources and Notable Trees

meet the criteria of the policy can be added to the inventory over time. Any such addition must first proceed through the First Schedule process of the RMA.

Policy 10.2.2 – When considering resource consent applications to remove or alter a notable tree or trees, or undertake activities in close proximity to a notable tree, have regard to:

- (a) **The reasons for the identification of the notable tree;**
- (b) **The effects of any pruning on the notable tree or proposed works in vicinity of the notable tree;**
- (c) **The extent to which substitute trees (or other vegetation) are to be planted and maintained and whether those trees (or other vegetation) will provide for indigenous biodiversity or amenity values in time;**

This policy sets out the matters that the Council should have regard to when assessing any resource consent application to remove or alter a notable tree or trees, or undertake activities in close proximity to a notable tree. These matters are designed to ensure the heritage or amenity significance of the tree or trees is recognised and appropriately provided for in the decision making process. There is an opportunity for any adverse effects to be remedied through the provision of substitute trees.

Policy 10.2.3 – Consider approving any application to remove or alter a notable tree or trees where:

- (a) **The tree or trees are dying, diseased, or have otherwise lost the essential qualities for which the tree was originally identified;**
- (b) **The tree or trees have become a danger to people;**
- (c) **The tree or trees are significantly restricting a particular use of the site which offers greater positive effects in terms of historic heritage or amenity values;**

There are circumstances where it will be appropriate to allow a notable tree to be removed, or otherwise altered (e.g., maintenance pruning), despite its contribution to historic heritage and/or amenity values. These circumstances are identified in (a) to (c) of the policy. In this way the policy recognise that trees can lose their essential qualities for which they are valued, create a risk in terms of public safety or otherwise unreasonably restrict the use of a site.

Policy 10.2.4 – Encourage the retention of notable trees.

The Council will encourage the retention of notable trees through the use of non-regulatory methods in addition to district rules. In this way, the policy recognises that proactive actions, including support for the owners of notable trees, can also be effective in ensuring notable trees are retained in our surrounding environment.

Methods of Implementation

The methods listed below are to be implemented by the Council unless otherwise specified.

10.M.1 Identifying Marlborough's Significant Heritage Resources and Notable Trees

The Council will identify significant heritage resources and notable trees within the RPS/Resource Management Plan. Each individual resource or tree will be described in a schedule and included on planning maps. Resources or trees to be identified will be those that meet the criteria in Policies 10.1.7 and 10.2.1, and/or those included on the New Zealand Heritage List/Rārangī Kōrero.

The relative heritage value of heritage resources recognised by the New Zealand Heritage List/Rārangī Kōrero will be included in the schedule. This will assist in the application of the policies of this chapter.

Assessment against the criteria will occur periodically. This will allow emerging heritage resources and notable trees to be added to the RPS/Resource Management Plan, via plan change processes, on an ongoing basis.

The Standard Method for Tree Evaluation (STEM) will be used to assess the value of individual trees and groups of trees. This method, developed by the Royal New Zealand Institute of Horticulture, uses a point system to rate 20 tree attributes in three general categories of condition, amenity and notable qualities.

Further information on each heritage resource or notable tree is held by the Council and is available to the public upon request.

Iwi Management Plans developed by Marlborough's tangata whenua iwi may identify areas of spiritual or cultural significance.

10.M.2 District and Regional Rules

District and regional rules will be used to ensure that the identified heritage resources and/or notable trees are appropriately protected. The following activities will require resource consent:

- Any demolition, relocation, alteration of, or addition to, a scheduled heritage resource;
- Any removal or significant trimming of a scheduled notable tree;
- Any excavation, laying of overhead or underground services or construction of buildings within close proximity to scheduled notable trees.

A tree protection zone will be established to provide certainty with respect to the application of district rules seeking to protect notable trees from the adverse effects of activities undertaken in close proximity to them. The zone will take into account that the potential for adverse effects will vary depending on the size and dimensions of the tree.

Permitted activity rules will be used to enable responsible maintenance of heritage resources and minor trimming of notable trees.

Land disturbance in places of significance to Marlborough's tangata whenua iwi will be discretionary activities. This, in conjunction with affected party approval, will allow the adverse effects of the land disturbance on the spiritual and cultural values of the relevant iwi to be assessed.

10.M.3 Support

The Council will support, including financially, the protection and enhancement of heritage resources and notable trees included in the RPS/Resource Management Plan in the following ways.

- Waiving (some or all) resource consent and building consent application fees where the activity requiring consent will assist with the protection or enhancement of a heritage resource or notable tree;
- Providing grants on an annual basis to facilitate the protection of heritage resources/notable trees and/or the community's appreciation of the resources/trees;
- Providing funding to assist with the ongoing maintenance of notable trees where required.

10.M.4 Liaison

The Council will liaise with the various agencies and groups involved in the protection of historic heritage in Marlborough on an ongoing basis to ensure that protection efforts are co-ordinated.

Chapter 10: Heritage Resources and Notable Trees

Heritage New Zealand, the Department of Conservation, the Archaeological Association, Marlborough's tangata whenua iwi, and other heritage organisations are the key agencies and groups in this regard.

10.M.5 Discovery Protocol

In conjunction with Heritage New Zealand, the New Zealand Archaeological Association and Marlborough's tangata whenua iwi, develop, maintain and implement a discovery protocol for archaeological sites. This will detail the procedures to be followed if any feature, artefact or human remains are discovered or are suspected to have been discovered. Information will be included within the protocol on the rohe of different iwi to enable people to make contact with the relevant iwi. The protocol will assist to ensure that the relevant provisions of the New Zealand Historic Places Act 1993 can then be applied.

10.M.6 Information

In conjunction with the Archaeological Association, the Council will provide information on known archaeological sites in Marlborough. This will assist resource users to determine whether they need to approach Heritage New Zealand for an archaeological authority.

The Council holds information on potentially sensitive areas in terms of European archaeology in our urban environments.

Information on heritage resources that is property specific will be available to the public through the issue of LIMs.

From time to time, use information held on heritage resources to tell Marlborough's story.

10.M.7 Affected Party Status

Heritage New Zealand will be treated as an affected party in respect of any resource consent application involving a heritage resource also recorded in the New Zealand Heritage List/Rārangī Kōrero or any resource consent application within a place of significance to one or more of Marlborough's tangata whenua iwi.

Marlborough's tangata whenua iwi will be treated as an affected party in respect of any resource consent application involving a waahi tapu site or area, or any resource consent application within a place of significance to one or more of the iwi.

Anticipated Environmental Results and Monitoring Effectiveness

The following table identifies the anticipated environmental results of the heritage resource and notable tree provisions of the RPS/Resource Management Plan. The anticipated environmental results are 10 year targets, unless otherwise specified. For each anticipated environmental result, there are a series of indicators that will be used to monitor the effectiveness of the heritage resource and notable tree provisions.

Anticipated Environmental Result	Monitoring Effectiveness
10.AER.1 Heritage resources that make a significant contribution toward Marlborough's historic heritage are identified and protected.	An increase in the number of heritage resources included in the RPS/Resource Management Plan. No loss of Category I heritage resources as measured through the grant of resource consent applications to demolish Category I heritage resources. Maintain or improve resident satisfaction with the heritage activity of the Council as measured by customer satisfaction survey.

	A review of the condition and extent of all heritage resources included in the RPS/Resource Management Plan is completed and reported within 10 years of becoming operative.
10.AER.2 Notable trees that make a significant contribution towards Marlborough historic heritage and/or amenity values are identified and protected.	An increase in the number of notable trees included in the RPS/Resource Management Plan. A review of the condition of all notable trees included in the RPS/Resource Management Plan is completed and reported within 10 years of becoming operative.
10.AER.3 Greater public awareness of the contribution that archaeological sites, heritage resources and notable trees make to our social and cultural wellbeing.	Property specific archaeological, heritage resource and notable tree information is made available to the public through the issue of LIMs. A reduction in the number of complaints of unlawful activity involving archaeological sites, heritage resources and notable trees.

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