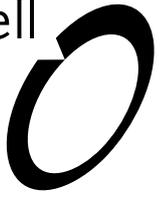


Boffa Miskell



Proposed Waikato District Plan – Review of ONFL

Response to Submission by Geoscience Society of NZ
Prepared for Waikato District Council

31 July 2020

1.0 Introduction

The submission of the Geoscience Society of New Zealand was accompanied by a report prepared by Bruce Hayman. This memo provides advice to the Waikato District Council on the matters raised in the submission and report. This response is structured by topics raised by the Geoscience Society.

The submissions address the appropriateness of the method applied to identify Outstanding Natural Features (ONFs) and seeks to include a number of geopreservation sites as ONFs. The following matter addresses the application of the method of assessment and in turn addresses the requested inclusion of geopreservation sites as ONFs.

2.0 Submission

The submission puts forward three requests:

Request 1. Our request is that a new schedule be added listing scheduled Outstanding Natural Features (ONF) in the District.

Request 2. We request that the schedule include Schedule 5B from the Franklin Section of the Operative Waikato District Scheme – Important Geological Sites and Landforms listed in the NZ Geopreservation Inventory containing sites of National Importance:

Request 3. We request that the following additional 31 Outstanding Natural Features (i.e. geological sites and landforms) as recorded in the NZ Geopreservation Inventory be added to the new Schedule of ONFs:

The reasons listed speak to the following matters:

- For the 'Franklin District area' - These have been protected as ONFs since the early 1990s and our Society has attended resource consent hearings and made comments on consent applications on a number of these sites for Council over this period, which have helped defend them from inappropriate subdivision, use and development as defined in RMA clause 4b.
- Outstanding Natural Features are geological sites and landforms. Marine and terrestrial ecosystems, cultural and historic heritage sites are all protected through other clauses in the RMA. ONFs were included in the RMA when it was formulated after our Society's submissions that a clause was needed to protect the outstanding aspects of NZ's unique geoheritage.
- The reason for both submissions is that ONFs need to be identified, mapped and scheduled so that they can be protected from inappropriate subdivision, use and development, as required by RMA Clause 4B and in the coastal environment NZ Coastal Policy 15 "avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment".
- That ONFs are outstanding geological sites and landforms is recognised by many of the other TLAs in northern NZ: e.g. the proposed Far North District Council schedules 113 ONFs - all geoheritage features; Whangarei District Scheme schedules 56 ONFs - all

geoheritage features; Auckland Unitary Plan schedules 254 ONFs - all geoheritage landforms and geological sites; Waitomo District has identified and mapped 75 potential ONFs to be scheduled - all geoheritage features.

In addressing the submission, the following firstly considers the method of assessment of reviewing and identifying the Operative Waikato District Plan. Secondly the application of the RPS criteria in the identification of the Outstanding Natural Features and Landscapes within the Waikato District.

3.0 Methodology

The difference in method and scale of assessment is the fundamental matter which has resulted in the differences between the submitters identified ONFs and the Waikato District Landscape Study's identified landscapes and features.

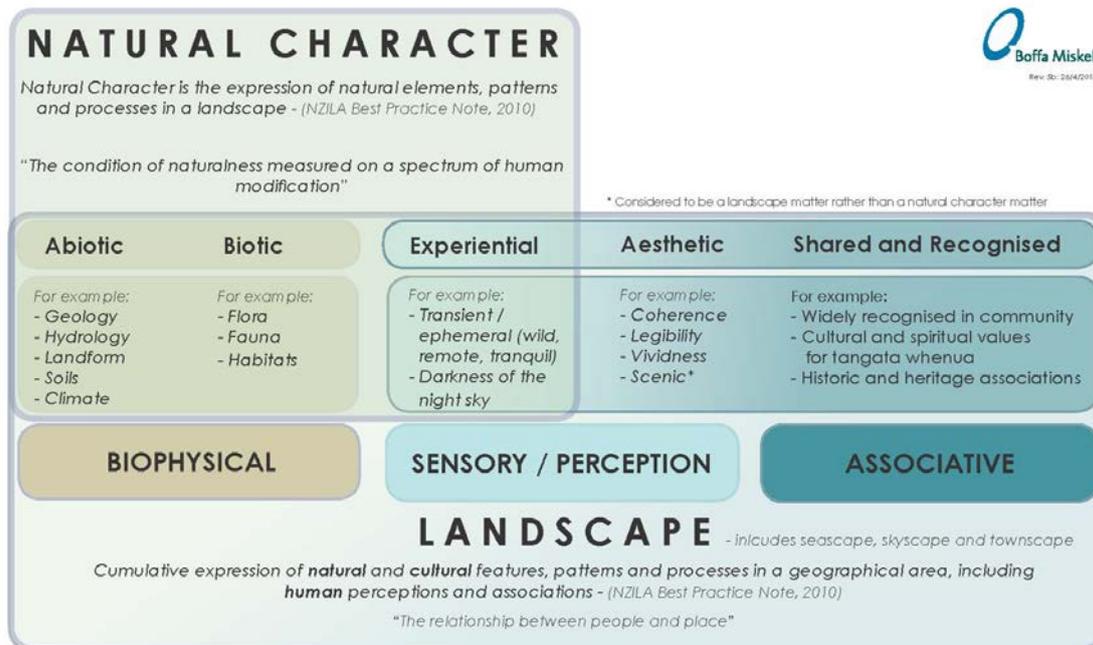
In order to understand why the differences in features an understanding of the method applied and the differences between the approaches is important.

The background paper accompanying the submission speaks to the legislation and is derived from the amended Pigeon Bay Criteria and NZILA approach to considering:

1. Biophysical features, patterns and processes may be natural and/or cultural in origin and range from the geology and landform that shape a landscape to the physical artefacts such as roads that mark human settlement and livelihood.
2. Sensory qualities are landscape phenomena as directly perceived by humans, such as the view of a scenic landscape, or the distinctive smell and sound of the foreshore.
3. Associative meanings are spiritual, cultural or social associations with particular landscape elements, features or areas such as pa, kainga, tupuna awa, mahinga kai and waahi tapu, or other sites of historic events or heritage. Associative activities are patterns of socially activity that occur in particular parts of a landscape or example popular walking routs or fishing spots.

In order to respond to the Waikato Regional Policy Statement, Table 12.2 the Waikato District Landscape Study addresses the attributed identified and further considers a further level of consideration of Maori relationship with landscape and features. Figure 1 below demonstrates the three dimensions of landscape under which attributes are grouped:

The Relationship Between Landscape and Natural Character



Also informing the method of assessment and reconfirming this approach are a number of Environment Court matters which speak to the dimensions for consideration and the weighting between these. More recently the *Matakana Island* decision speaks to the weighting given to the Associative dimension and this is on equal weighting to that of the Biophysical and Sensory dimensions. As part of this process the Waikato District Council's Iwi Reference Group were engaged with to provide input using agreed cultural values. This cultural dimension sits across the three dimensions and does not specifically identify cultural landscapes, however, provides a deeper understanding of a Te Ao Maori world view.

3.1 Landscapes versus Features

Natural Landscapes are larger areas that are perceived as a whole, which can include a number of natural features within them. Landscapes can be either experienced from within or seen as the whole of the outlook. Landscape boundaries can coincide with visual catchments. Natural Landscape Features are discrete elements within a landscape, which are generally experienced from outside the features boundaries. Features display integrity as a whole element and can often be clearly distinguished from the surrounding landscape, which forms the context around them. Generally, features are defined by their geomorphological landform boundaries.

However, in some instances (such as areas of native bush), features are defined more readily by land cover characteristics. Small landscapes can nest within larger landscapes and are scale dependant. For example, the Te Kaha Point duneland is a landscape feature within the Whaingaroa Harbour landscape. At a wider scale the harbour and its margins are a feature of the volcanic landscape of the area, which also includes the Raglan settlement and Karioi.

The method applied to the evaluation of outstanding natural features and landscapes considers the same three dimensions. Policy direction from the RMA 1991, NZCPS 2010, and the

Waikato Regional Policy Statement do not provide separate criteria or attributes that distinguish a difference between a feature or landscape. As such the method of evaluation considers geopreservation sites as part of the overall evaluation however does not weight these more heavily than the remaining dimensions (Sensory and Associative) for either a feature or landscape. The overall evaluation approach applies a seven point scale which is not cumulative in a numerical calculation but considers the overall landscape or feature in the round.

3.2 Scale

Turning to scale, the Waikato Landscape Study, comprised a review of the Waikato District's Landscape's and undertook an approach to characterise the District at a broader scale and then consider the existing and potential additional landscapes of importance. Smaller geological features where they cannot be experienced outside the feature itself have not been included. This does not lower the geological importance of the feature but considers the overall scale in which the feature is experienced and provides equal consideration of the sensory and associative dimensions.

3.3 Evaluation

Consideration of findings from the desktop review and on-site investigations assisted the study team to determine a landscape's or feature's biophysical, sensory or associative values. This essentially used a seven-point scale from Very High through to Very Low. Under the methodology, outstanding landscapes or features contained at least a Very High or High attribute scoring. It was acknowledged that not all landscapes needed to score Very High in every category to be considered as an Outstanding Natural Feature or Landscape (ONF/L), although this depended on the landscape under consideration.

While some landscapes/ features have high amenity values ONF/Ls were only identified in areas that also contained other high landscape values, such as Mt Karioi, which in addition to scenic or sensory values includes, high biophysical and associational values. Landscapes and features containing particular scenic values, but a noticeably lower rating of other landscape values, have been identified as Significant Features and Landscapes (SF/Ls). The values of these SF/Ls are often more alike to Significant Amenity Landscapes (SAL), which have been identified in other districts under S7(c) of the RMA. Through case law SALs are often associated with rural landscapes that have an 'arcadian' character.

The threshold between SF/L and ONF/L was defined based on a rating for each of the three attributes outlined above. ONF/Ls were defined as those landscapes and features that would reach an overall rating of greater than 'High' with no one of the attributes rated lower than 'Moderate'. A few SF/Ls had a low rating for one of the attributes but were overall still rated as moderate- high. This allows for landscapes and features to be considered as SF/Ls that may for example be relatively modified biophysically but very important in terms of their cultural associations.

3.4 Outstanding Natural Landscapes

Natural Landscapes are larger areas that are perceived as a whole, which can include a number of natural features within them. Landscapes can be either experienced from within or seen as the whole of the outlook. Landscape boundaries can coincide with visual catchments.

Within this District the Outstanding Natural Landscapes have been identified as Hunua Ranges, Mt Karioi and Mt Pirongia.

3.5 Outstanding Natural Features

Natural Landscape Features are discrete elements within a landscape, which are generally experienced from outside the features boundaries. Features display integrity as a whole element and can often be clearly distinguished from the surrounding landscape, which forms the context around them. Generally, features are defined by their geomorphological landform boundaries. However, in some instances (such as areas of native bush) are defined more readily by land cover characteristics.

Within this District the Outstanding Natural Features have been identified as Pouraureroa Stream Bush, Waikato River and Wetlands, Whangamarino Wetland, Lake Waikare, Lake Whangape, Taupiri Range, Te Hoe, Hakarimata Range, Kokako Hills, Wairenga (Bridal Veil Falls), Manuaitu and Potahi Point.

3.6 Significant Amenity Landscapes or Features

The term 'Significant' has been used in this study to identify natural features and landscapes that do not meet the quality threshold for 'Outstanding' in terms of their values. These areas were identified due to their relatively high landscape value, which in the view of the study team lies just below or around the threshold for ONF/L identification.

Within this District the Significant Amenity Landscapes or Features have been identified as Waikato River Margins, Onewhero Tuff Ring, Alexandra Redoubt Bush, Pukekawa, Rataroa Hills, Te Hoe Hills, Opuatia Wetland, Te Hehe Bush, Te Umukaraka Bush, Kaawa Dunes including Matira Sand Dune, Waimahi Dunes, Te Kotuku Dunes, Taupiri Range Lower Slopes, Karioi Lower Slopes, and Toreparu Wetland.

3.7 Response to Submission on Method

The Best Practice Guide attached to the submission speaks to the background of the ONF and the application of the term 'Outstanding' with regard to natural features and the policy background informing the identification of ONFs.

The importance of the Geopreservation features within the District are not questioned or countered in regard to their geological importance. The key consideration and difference is the application of scale and method with regard to the weighting of the dimensions of landscapes and features.

It is clear both from policy direction at a National and Regional level that the attributes for consideration are the same. The different focus of the assessment approaches is to the weighting of the biophysical dimension and the application of scale at a District wide level.

There are absolute similarities between the approaches however the application at a District wide scale where consideration of the context and comparative ONF's throughout the District need to be weighed up.

In the Operative Waikato District Plan the approach to distinguishing ONF and ONL differed between the old "Franklin District" and the remainder of the Waikato District. The two approaches focus at different scales of assessment with Franklin area identifying

geopreservation sites under schedule 5b and the remainder of the Waikato District focusing on a Landscape Policy Area with geopreservation sites informing but not delineating the identified areas.

It is considered the Waikato District Landscape Study does address the geopreservation sites however does not distinguish a difference in method that weights heavily toward the biophysical dimension of the landscape or feature. The Landscape Study also focuses on the scale of the District and the attribute weighted approach, which has resulted in the smaller features contributing to the character of an area but not always individually identified themselves as ONFs.

In summary there are absolute cross overs between the approaches discussed above however it is considered that not all requested ONF's within the submission, when assessed as outlined above, demonstrate factors, values or associations that contribute to the feature being considered Outstanding at a district wide scale.

4.0 Submission Analysis and Recommendations

A summary of the details of the submission from Geoscience Society of New Zealand is outlined below with a comparative analysis of those features included / excluded in the Waikato District Landscape Study.

Schedule to Section D Appendices and Schedules, entitled "Important Geological Sites and Landforms", and include the following sites (from the Waikato District Plan - Franklin Section, Part 5, Schedule 5B) in the schedule.

Submission requested inclusion of ONFs	Operative Waikato District Plan		Proposed Waikato District Plan			Comments / Recommendations
	Franklin Schedule 5b	Waikato Landscape Policy Area	ONF / ONL	SAL	Natural Character	
1. Daff Road Jurassic Plant Beds	Yes	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. - Scale
2. Kaawa Creek-Ngatutura Bay Section	Yes	NA	Not identified	Yes - Kawa Dunes	High	Proposed SAL 'Kaawa Dunes'. Identified as HNC Kaawa Creek.
3. Kellyville Tuff Ring	Yes	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
4. Moeweka Quarry Jurassic Fauna	Yes	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
5. Onewhero Tuff Ring	Yes	NA	Not identified	SAL - Onewhero tuff ring	Not identified	Mapped as 'Onewhero Tuff Ring' SAL.
6. Opuatia Cliff Jurassic Fauna	Yes	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
7. Port Waikato to Tuakau Bridge Road Jurassic Section	Yes	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Currently mapped as SNA.
8. Pukekawa III Scoria Cone	Yes	NA	Not identified	SAL - Pukekaea	Not identified	Mapped as Pukekawa SAL.
9. Huriwai Beach Jurassic Plant Beds	Yes	NA	Not identified	Not identified	Not identified	SNA Overlay to Huawai (West) coast. Identified as within coastal environment – but not identified as HNC or ONC
10. Waikato River Delta	Yes	NA	Yes identified ONF	Not identified	Not identified	Included and ONF.
Remainder of Waikato District – Inclusion of features sought						
1. Port Waikato sandspit	Identified	NA	No	Yes	High	Included and

Submission requested inclusion of ONFs	Operative Waikato District Plan		Proposed Waikato District Plan			Comments / Recommendations
	Significant Natural Feature					
						considered in relook at wider ONF of Waikato River as part of the Environs
2. Ngapuriri natural arch and surrounding karst	No	NA	Not identified	Not identified	Not identified	Does not qualify as ONF for District scale
3. Huriwai-Waikawau coastal section	Yes	NA	Not identified	Not identified	High	Identified as within coastal environment Small part identified as high natural character Opura. Currently SNA Overlay to Huawai (West) coast.
4. Waiwiri Beach unconformity and basal Waitemata group	No	No	Not identified	Not identified	High	Identified as High Natural Character Opura. Currently Identified as SNA Overlay.
5. Pukeotahinga scoria cone	No	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
6. Onewhero scoria cone	Yes	NA	No	Yes	No	Identified as a SAL Onewhero Tuff Ring
7. Kauri Rd scoria cone	No	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
8. Onepoto volcanic cone	No	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
9. Te Kohanga tuff ring	No	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
10. Rasmussen Rd tuff ring	NA	No	Not identified	Not identified	Not identified	Part of the area was identified as an SNF (OWDP) Does not qualify as ONF. Sensory / Associative values.
11. Waiuku volcanic cone	NA	No	Not identified	Not identified	Not identified	Part of the area was identified as an SNF (OWDP) Does not qualify as ONF. Sensory / Associative values.
12. Pokeno scoria cone	NA	No	Not identified	Not identified	Not identified	Part of the area was identified as an SNF (OWDP) Does not qualify as ONF. Sensory /

Submission requested inclusion of ONFs	Operative Waikato District Plan		Proposed Waikato District Plan			Comments / Recommendations
						Associative values.
13. Serpell Rd tuff ring	No	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
14. Puketoka conglomerate	No	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Sensory / Associative values.
15. Waikorea hot springs	No	NA	Not identified	Not identified	Not identified	Does not qualify as ONF. Scale
16 Gibsons Beach unconformity and fossil karst	No	NA	Not identified	SAL	Not identified	Identified as SAL. Te Kotuku Dunes
17 Taupiri Gorge	NA	Yes – Edges of Waikato River included in Landscape Policy Area	Not identified	Not identified	Not identified	Some of the ONF areas of Taupiri Range and Hakarimata Range fall into this area
18. Dunphall Bluffs Oligocene sandstone	NA	No	Not identified	Not identified	Not identified	Does not qualify as ONF. – scale, Sensory / Associative values.
19. Waingaro hot springs	NA	No	Not identified	Not identified	Not identified	Does not qualify as ONF. – scale, Sensory / Associative values.
20. Carters Beach shore platforms	NA	No	Not identified	Not identified	Not identified	Identified as within coastal environment – but not identified as HNC or ONC
21. Raglan coastal karst	NA	No	Not identified	Not identified	Partially identified as HNC	Parts identified as HNC in Rangitoto Point.
22. Te Toto Gorge lava and pyroclastic sequence	NA	Yes	ONL Karioi	SAL Karioi	Very High	Identified as Very High Natural Character, ONL and SAL. Karioi
23. Mt Karioi	NA	Yes	ONL Karioi	SAL Karioi	Very High	Identified as Very High Natural Character, ONL and SAL. Karioi
24. Papanui Pt volcanics	NA	Yes	No	SAL Karioi	No	Identified as SAL.
25. Bridal veil Falls columnar jointed basalt	NA	Yes	Yes - ONF	No	No	Identified as ONF Wairēinga
26. Lake Disappear blind valley	NA	No	Not identified	Not identified	Not identified	Does not qualify as ONF for District scale
27. Lake Disappear karst	NA	No	Not identified	Not identified	Not identified	Does not qualify as ONF for District scale
28. Taranki Pt karst	NA	No	Not identified	Not identified	Not identified	Identified in Coastal Terrestrial Area – but does not qualify as

Submission requested inclusion of ONFs	Operative Waikato District Plan		Proposed Waikato District Plan			Comments / Recommendations
29. Aotea dune field	NA	Yes	ONF Oioroa	No	ONC	Identified as Outstanding Natural Character and ONF Oioroa
30. Helectite Hole karst	NA	No	No	No	No	Does not qualify as ONF for District scale

ONL = Outstanding Natural Landscape | ONF = Outstanding Natural Feature | SAL = Significant Amenity Landscape

NCA = Natural Character Area | ONC = Outstanding Natural Character

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Appendix 1: Submission – Full

Point Number	Summary of Decision Requested	Decision Reasons
8.1	Add a new schedule listing scheduled Outstanding Natural Features (ONF) in the district.	<ul style="list-style-type: none"> ▪ Outstanding Natural Features are geological sites and landforms. Marine and terrestrial ecosystems, cultural and historic sites are all protected through other clauses in the RMA. ▪ Outstanding natural features were included in the RMA after our Society's submission where a clause was needed to protect the outstanding aspects of NZ's unique geoheritage. ▪ Outstanding natural features are outstanding geological sites and landforms recognised by other territorial and local authorities in northern NZ: e.g. Far North District Council 113 ONFS, Whangarei District Scheme schedules 56 ONFs, Auckland Unitary Plan schedules 254 ONFs, Waitomo District 75 potential ONFs to be scheduled. All of the above are geoheritage features. ▪ Identifying and scheduling outstanding natural features are the most critical actions for a District Plan.
8.2	<p>Add a new Schedule to Section D Appendices and Schedules, entitled "Important Geological Sites and Landforms", and include the following sites (from the Waikato District Plan - Franklin Section, Part 5, Schedule 5B) in the schedule.</p> <ol style="list-style-type: none"> 1. Daff Road Jurassic Plant Beds 2. Kaawa Creek-Ngatutura Bay Section 3. Kellyville Tuff Ring 4. Moeweka Quarry Jurassic Fauna 5. Onewhero Tuff Ring 6. Opuatia Cliff Jurassic Fauna 7. Port Waikato to Tuakau Bridge Road Jurassic Section 8. Pukekawa III Scoria Cone 9. Huriwai Beach Jurassic Plant Beds 10. Waikato River Delta 	<ul style="list-style-type: none"> ▪ These features are currently Outstanding Natural Features in the Franklin Section of the operative Waikato District Plan. ▪ These features have been protected as Outstanding Natural Features since the 1990s. ▪ The Society has attended resource consent hearings and commented on applications which have helped defend them from inappropriate subdivision, use and development as defined in RMA clause 4b. ▪ Not scheduling or showing these Outstanding Natural Features on planning maps must be an oversight, as it appears to be tantamount to removing the protection they so desperately need and have had for quarter of a century.
8.3	Add the following additional Outstanding Natural Features (i.e.	<ul style="list-style-type: none"> ▪ The significance and location of these outstanding features are outlined in the publicly accessible NZ

	<p>geological sites and landforms) as recorded in the NZ Geopreservation Inventory to a new schedule of Outstanding Natural Features as follows:</p> <ol style="list-style-type: none"> 1. Port Waikato sandspit 2. Ngapuriri natural arch and surrounding karst 3. Huriwai-Waikawau coastal section 4. Waiwiri Beach unconformity and basal Waitemata group 5. Pukeotahinga scoria cone 6. Onewhero scoria cone 7. Kauri Rd scoria cone 8. Onepoto volcanic cone 9. Te Kohanga tuff ring 10. Rasmussen Rd tuff ring 11. Waiuku volcanic cone 12. Pokeno scoria cone 13. Serpell Rd tuff ring 14. Puketoka conglomerate 15. Waikorea hot springs 16. Gibsons Beach unconformity and fossil karst 17. Taupiri Gorge 18. Dunphall Bluffs Oligocene sandstone 19. Waingaro hot springs 20. Carters Beach shore platforms 21. Raglan coastal karst 22. Te Toto Gorge lava and pyroclastic sequence 23. Mt Karioi 24. Papnui Pt volcanics 25. Bridal veil Falls columnar jointed basalt 26. Lake Disappear blind valley 27. Lake Disappear karst 28. Taranki Pt karst 29. Aotea dune field 30. Helectite Hole karst 	<p>Geopreservation Inventory.</p> <ul style="list-style-type: none"> ▪ Outstanding natural features need to be identified, mapped and scheduled so that they can be protected from inappropriate subdivision, use and development, as required by RMA clause 4B and in Policy 15 of the NZ Coastal Policy Statement which states: avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment. ▪ Outstanding Natural Features are geological sites and landforms. Marine and terrestrial ecosystems, cultural and historic heritage sites are protected through other clauses in the RMA. ▪ Identifying and scheduling outstanding natural features and providing criteria for potentially identifying others are the most critical actions for the District Plan.
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8.4	<p>Add more policies and rules to protect Outstanding Natural Features and provide criteria for the potential identification of others.</p>	<ul style="list-style-type: none"> ▪ Outstanding Natural Features need to be protected from inappropriate subdivision, use and development, as required by RMA clause 4B and Policy 15 of the NZ Coastal Policy Statement which states: "avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment". ▪ Outstanding Natural Features are geological sites and landforms. Marine and terrestrial ecosystems, cultural and historic heritage sites are protected through other clauses in the RMA. ▪ The protection of Outstanding Natural Features is the most critical action for the District Plan. ▪ Council needs to consider other District Plans in the region that contain objectives, policies and criteria relating to Outstanding Natural Features.
8.5	<p>Add into Section 3.3 Outstanding Natural Features, criteria for identifying Outstanding Natural Features, similar to that in the Auckland Unitary Plan, Northland Regional Plan and other local districts:</p> <p>Assessment criteria for identifying ONFs</p> <p>(a) the extent to which the landform, feature or geological site contributes to the understanding of the geology or evolution of the biota in the region, New Zealand or the earth;</p> <p>(b) the rarity or unusual nature of the site or feature;</p> <p>(c) the extent to which the feature is an outstanding representative example of the diversity of district's natural landforms and geological features;</p> <p>(d) the extent to which the landform, geological feature or site is part of a recognizable group of features (e.g. caves and karst group: South Auckland volcanoes group);</p> <p>(e) the extent to which the landform or geological feature contributes to the aesthetic value or visual legibility of the wider landscape;</p> <p>(f) the extent of community association with, or public appreciation of, the values of the feature or site;</p> <p>(g) the potential value of the feature or site for public education;</p> <p>(h) the potential value of the feature</p>	<ul style="list-style-type: none"> ▪ Providing criteria for potential outstanding natural features are the most critical action for District Plans. ▪ Council officers and public need to have clarity as to what the criteria are for identifying outstanding natural features and how consent applications can be assessed against the values of individual outstanding natural features.

	<p>or site to provide additional understanding of the geological or biotic history;</p> <p>(i) the state of preservation of the feature or site;</p> <p>(j) the extent to which a feature or site is associated with an historically important natural event, geologically related industry, or individual involved in earth science research;</p> <p>(k) the importance of the feature or site to Mana Whenua</p>	
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