

IN THE MATTER of applications pursuant to the
Resource Management Act 1991

BY Weston Lea Limited

FOR land use and subdivision consents
for a large scale residential
development and associated land
use activities and sites works at
Peacocke, Hamilton

STATEMENT OF EVIDENCE ARCHAEOLOGY

Dr Alexandra Lee Simmons

4 March 2019

1.0 Introduction

My full name is Alexandra Lee Simmons. I am the senior archaeologist and heritage specialist at Simmons & Associates Ltd.

2.0 Qualifications and Experience

I have the following qualifications, professional affiliations and experience:

- 2.1 I hold a Doctor of Philosophy in Archaeological from the University of Otago and a Masters of Arts in Archaeology, as well as, minor degrees in historic architecture and cultural anthropology from Oregon State University.
- 2.2 I am a member of the New Zealand Archaeological Association (NZAA), the Society for Historical Archaeology (SHA), the Australasian Society for Historic Archaeology (ASHA) and the New Zealand Food History Society (NZFHS).
- 2.3 My employment history includes eighteen years for Simmons and Associates Ltd. and eight years with Heritage New Zealand managing heritage in the Central North Island.
- 2.4 I have 40 years experience working as an archaeologist and historic architecture specialist. My experience in the field of archaeology includes: research, survey, investigation, analysis and report preparation, and authorship of management and conservation plans. I have also served as an expert witness for Environment Court and District Council in relation to archaeology and historic structures.
- 2.5 My archaeological work has covered a variety of time periods and geographic locations, but for the last 30 years has focussed on New Zealand archaeology. I have fifteen years experience periodically assessing, sampling, and excavating Maori garden sites, similar to those in the Amberfield subdivision development area.

3.0 Code of Conduct

3.1 I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and have complied with that practice note in preparation of this evidence. I agree to comply with it in presenting evidence at this hearing. The evidence that I give is within my area of expertise, except where I have stated my reliance on other identified evidence. I have considered all material facts that are known to me that might alter or detract from the opinions that I express in this evidence.

4.0 Scope of Evidence

4.1 I have been retained by Hamilton City Council (HCC) to provide archaeological advice relating to the consent applications by Weston Lea Limited (the applicant).

4.2 In preparing this evidence I have reviewed the following:

- a. Assessment of Environmental Effects prepared by Merestone Ltd, including Appendix A Relevant Objectives and Policies and Appendix B Rules Compliance;
- b. Appendix Q; Amberfield--Assessment of Archaeological Values and Effects prepared by Warren Gumbley and Mana Laumea, April 2018;
- c. Addendum: Amberfield- Assessment of Archaeological Values and Effects prepared by Warren Gumbley and Mana Laumea, dated 23 July 2018;
- d. Heritage New Zealand Archaeological Authority 2019/069- a 10 year authority pursuant to section 48 of the Heritage New Zealand Pouhere Taonga Act 2014 for archaeological sites: S14/64, S14/176, S14/224, S14/318, S14/319, S14/475, S14/476, S14/477, S14/478, S14/479 and S14/480; excluding the proposed Archaeological Heritage Reserve.

4.3 I carried out a site visit to the Amberfield Subdivision on 6 June 2018 and walked over the project area with Mr Warren Gumbley, the Weston Lea Limited project archaeologist. He provided information about the eleven discrete Māori horticultural soil areas affected by the development, the testing pitting that

provided archaeological information, and answered questions about the proposed historic reserve.

4.4 The purpose of this statement of evidence is to address matters raised in the application relating to archaeology and consideration of submissions in this regard.

4.5 My evidence covers:

Review and evaluation of the applicant's two archaeological assessment of archaeological values and effects reports against relevant statutory provisions of the Resource Management Act 1991, the Waikato Regional Policy Statement, and Hamilton City Council's Peacocke Structure Plan and Operative District Plan.

Resource Management Act 1991

4.6 The Resource Management Act 1991 Section 6f, Matters of National Importance, requires the protection of historic heritage from inappropriate subdivision, use, and development. The Amberfield Assessment of Environmental Effects report identifies eleven archaeological sites consisting of discrete Māori horticultural soil areas as affected by the development. The quantity and quality of the information the sites contain is unknown. The applicant's archaeological assessment report states:

"Information value is affected by the condition of [the] archaeological sites, which we know to be variable with part of some sites destroyed by activities such as sand quarrying and the construction of buildings with other parts adversely affected by modern cultivation." (Gumbley and Laumea, April 2018 p.48)

The earthworks proposed is described as having an adverse effect on an estimated 85% of the probable archaeological deposits associated with eleven sites. The applicant acknowledges the effects are more than minor in terms of RMA section 104D. To address the adverse effects and to achieve consistency with the relevant objective and policies of the Hamilton City Council's Operative Plan and Peacocke Structure Plan the applicant has proposed a number of mitigation measures. The Amberfield Assessment of Archaeological Values and Effects Report (April 2018) states the primary mitigation methods to remedy the adverse effects will be:

- a. Archaeological site investigation based on the conditions and requirements of an archaeological authority issued under the Heritage New Zealand Pouhere Taonga Act 2014;
- b. Creation of a historic heritage reserve containing Māori borrow pits and associated sub-surface deposits. Provisions for the reserve include preparation of a managed plan based on the principles of the ICOMOS New Zealand Charter 2010;
- c. The development of interpretive records in conjunction with manawhenua that could include interpretation panels, pou or other installations; and
- d. Cultural recognition expressed in place, trail and street naming.

4.7 The Amberfield-Assessment of Archaeological Values and Effects Report (April 2018) states the investigation of the archaeological site deposits in the development area are to be determined by Heritage New Zealand Pouhere Taonga (HNZPT) under the statutory processes in the Heritage New Zealand Pouhere Taonga Act 2014.

Heritage New Zealand Pouhere Taonga issued a ten year archaeological authority, no. 2019-069, to Weston Lea Limited on 29 August 2018. The general authority permits earthworks on eleven archaeological sites identified in the Amberfield Subdivision development based on specific conditions. For example the archaeological work is to be carried out in accordance with the Amberfield Archaeological Site Management Plan and the Amberfield Mitigation and Research Strategy. (Neither document has been submitted to Hamilton City Council (HCC) as part of the Weston Lea Ltd. resource consent.)

Waikato Regional Policy Statement

4.8 The Waikato Regional Policy Statement (RPS) Policy 10.3 states, effects of development requires that subdivision use and development give recognition to historic and cultural heritage and to integrate it with development where appropriate. Mechanism for achieving this are identified in Policy 10.3.1 and include cultural values assessments and cultural impact assessments, conservation and open space covenants, and accidental discovery protocols.

The applicant has complied with these requirement by:

- a. Assessing the eleven sites using the RPS Assessment Criteria 10A Table 10-1 Criteria in Relation to Historic Heritage Qualities. The Amberfield archaeological reports evaluate the heritage qualities of the sites and assess effects. The heritage qualities assessments based on RPS Table 10-1 criteria provide a thorough and robust review of the heritage values of the sites effected by earthworks and a separate stand alone review of the proposed heritage reserve. For example Gumbley and Laumea state in relation to the eleven sites:

“The sites are likely to contain archaeological evidence associated with Māori-made garden soils and borrow pits, as well as potential sub-surface features which may yield information on Māori domestic settlement associated with the horticultural sites along with crop storage structures. This information can only be recovered by archaeological methods.” (Gumbley and Laumea April 2018 p.48)

With regard to the heritage reserve, [The] “proposed heritage reserve contains a representative component of the broader archaeological landscape surrounding Amberfield. A test trench (Geotech Trench 4) has demonstrated that the archaeological materials remain in good condition within the area encompassed by the reserve. Specifically the lower terrace, at least, has not been ploughed. . . the reserve area provides a good example of a typical pre-European Māori gardening landscape.” (Gumbley and Laumea July 2018 p.11)

- b. Setting aside a proposed historic heritage reserve in the subdivision. The reserve provides open space and preserves an estimated 15% of the probable archaeological site area. This action satisfies the intent of RPS Policy 10.3. The applicant has also proposed the reserve have a historic reserve management plan based on ICOMOS principles as part of the development conditions.

It is my opinion that the establishment of a Historic Reserve and governed by a management plan based on ICOMOS principles provides for the long term preserve of part of site S14/318’s archaeological features. The location of the reserve in the subdivision and the involvement of manawhenua in its

interpretation and recognition will add to the public good and maintain the relationship of Māori with the site and the Waikato River.

- c. Acknowledging compliance with the Accidental Discovery Protocol in the Hamilton City Council Operative Plan Rule 19.4.2 and Volume 2, Appendix 8-2, to ensure if unidentified archaeological sites are discovered during development the effects are managed.

Hamilton City Council Peacocke Structure Plan Cultural Environment

- 4.9 The Peacocke Structure Plan, Objective 3.4.1.15 specifies protection of historic and cultural significant sites or features. One site A100, S14/176 is listed in the Operative District Plan in Schedule 8C as a Group 2 Archaeological and Cultural Site. Rule 19.3y of the Activity Status Table permits earthworks on Group 2 archaeological and cultural sites subject to other standards in the Operative Plan.

The other ten sites in the development area, S14/64, S14/224, S14/318, S14/319, S14/475, S14/476, S14/477, S14/478, S14/479, S14/480 and S14/176 have been assessed as a group in the Appendix Q- Assessment of Archaeological Values and Effects. The assessment indicates the sites contain significant value based on their conditions and potential archaeological content. The values table, pages 48-51 notes:

'Pre-European Māori horticultural sites form a major element of the archaeological landscape of the Hamilton Basin with the overall level of preservation within the development area classifiable as moderate to good. . .

These sites will be important for evaluating current understandings of pre-European horticultural strategies in the Waikato by allowing comparison of the results with the emerging understanding of the patterns and strategies identified at other sites.' (Gumbley and Laumea April 2018, p.48-50)

This objective (3.4.1.15) is not provided for in the consent application because destruction of an estimated 85% of the probable archaeological sites and features is required to develop the Amberfield Subdivision.

- 4.10 Policy 3.4.1.15a of the Peacocke Structure Plan prescribes respect for known pa, borrow pits and other cultural associations with water ways and the land and

through the creation of protective reserves or integrating the features into the development. The applicant has satisfied this objective by proposing a historic reserve be set aside. The reserve contains examples of Maori borrow pits and pre-European Maori modified soils. The creation of the historic reserve provide an opportunity for preserving the area for the benefit of all stakeholders, in keeping with the policy objective.

- 4.11 The Peacocke Structure Plan Policy 3.4.1.15b stipulates, cultural and heritage can be generally perpetuated through retaining familiar landmarks and also by non-physical means such as place names. The applicant has satisfied this policy by:
- a. Setting aside a reserve that contains borrow pits, which are a type of landmark feature;
 - b. Proposing a management plan based on ICOMOS principles to preserve and manage the landmark features in the reserve;
 - c. Proposing interpretation of the reserve through the use of markers and other methods; and
 - d. Proposing cultural recognition through place, street and trail as a mitigation measure.

Hamilton City Operative District Plan Historic Heritage

- 4.12 The Hamilton City Council Operative District Plan (Operative Plan) Objective 19.2.1 states, that significant buildings, structures, sites and items that define the City's historic heritage are identified and protected. Policy 19.2.2b states the loss of heritage values associated with scheduled items shall be avoided.
- 4.13 The principles of Objective 19.2.1 and Policy 19.2.2b were discussed under 4.9. I noted, one site A100, S14/176, is listed in the Operative Plan on Schedule 8C as a Group 2 Archaeological and Cultural Site. Group 2 Archaeological and Cultural Sites are identified as areas where there is a higher potential for finding artefacts and archaeological sites. Rule 19.3y (Activity Status Table) permits earthworks on Group 2 archaeological and cultural sites subject to other standards in the Operative Plan.

- 4.14 In addition to the scheduled site, the other ten sites in the Amberfield development area have been assessed by Warren Gumbley, the applicant's archaeologist, using the RPS criteria and are considered significant (as noted in 4.8a).
- 4.15 Policy 19.2.1a requires the City's historic heritage shall be protected from adverse effects of subdivision, use and development. The applicant proposes to preserve 15% of the total estimated archaeological site area in a historic reserve and acknowledges approximately 85% of the estimated site area may be destroyed. This general action is not consistent with Objective 19.2.1 and Policy 19.2.2b, although destruction of site A100 (S14/176) is permitted under Rule 19.3y. It is noted in Section 19.1 that Group 2 Archaeological sites are identified in the District Plan for information purposes only. Heritage New Zealand has the primary responsibility for the regulation of activities relating to archaeological sites under the Heritage New Zealand Pouhere Taonga Act 2014.
- 4.16 Policy 19.2.1b, ensure that where features have been destroyed or damaged, the historical heritage values of these sites are recorded and recognised to insure historical legibility of Hamilton City. The methods proposed by the applicant for remedying and mitigating the effects of development include site investigation and recording. To address Policy 19.2.1b and the Heritage New Zealand Pouhere Taonga Act 2014 the applicant obtained a ten year archaeological authority on 29 August 2018 (Authority no 2019-069) from Heritage New Zealand for the eleven sites affected by the development earthworks. The authority permits mitigation of effects to the archaeological sites through systematic investigation.
- 4.17 Systematic archaeological investigation and recording is the most common mitigation method employed for undertakings that will have an adverse effect on archaeological sites. Archaeological investigation is a destructive measure, but one that reduces the deleterious effects of earthworks on archaeological sites and results in the recording of information that would otherwise be lost. Within the Amberfield Subdivision development area the archaeological information is believed to be primarily composed of sub-surface deposits that relate to Māori modification of the landscape for horticultural and other purposes. In my opinion systematic data recovery, analysis, interpretation and reporting based on a research design is the most effective method for mitigating the effects of earthworks in the development area and ensuring Policy 19.2.1b is satisfied.

4.18 Policy 19.2.1c specifies subdivision and development shall adhere to the conservation principles of the International Council on Monuments and Sites (ICOMOS) New Zealand Charter for the Conservation of Place of Cultural Heritage Value where applicable. The applicant proposes to satisfy Policy 19.2.1c by preparing a management plan for the historic reserve consistent with the principles of ICOMOS. This action is an accepted archaeological practice used to ensure long term site preservation. Management plans of this type are usually prepared by an archaeologist in liaison with iwi representatives, Heritage New Zealand, and a council reserve representative.

Hamilton City Operative Plan Archaeological and Cultural Sites

4.19 The Operative Plan, Objective 19.2.4 states, significant archaeological and cultural sites shall be protected from damage or destruction. This matter was discussed above under Objective 19.2.1 and Policy 19.2.1a. It was noted, one site S14/176, is included on Schedule 8C Group 2 (Archaeological and Cultural Sites) as A100. Schedule 8C: Group 2 Archaeological and Cultural Sites are identified as areas where there is a higher potential for finding artefacts and archaeological sites. The Group 2 sites are identified in the Plan for information purposes. Activity Status Table, Rule 19.3y, permits earthworks on a Group 2 archaeological and cultural sites subject to other standards in the Operative Plan.

4.20 Policy 19.2.4a requires subdivision, use and development shall be managed to avoid damage to archaeological and cultural sites where they exist, or are likely to exist. The applicant acknowledges the effects of development on archaeological and cultural sites where 85% of the estimated archaeological site area may be destroyed by the development. The applicant proposes to set aside 15% of the estimated archaeological site area in a historic reserve for preservation and management.

4.21 Policy 19.2.4b specifies, the protection and management of sites of archaeological and cultural significance shall be informed by their significance. As was noted in 4.5.4a the applicant's assessment of the eleven sites archaeological and cultural significance, using the RPS criteria, indicates the archaeological value of the sites are based primarily on their sub-surface features which may provide information through archaeological investigation. The applicant's archaeological assessment of the cultural significance qualities was reserved for iwi comment, with the exception

of the opportunity for education through interpretation based on the archaeological investigation findings.

- 4.22 Policy 19.2.4c mandates, activities or development shall not adversely affect the physical structure and integrity of scheduled sites. This may include:
- I. Inappropriate planting;
 - II. The removal of vegetation where it affects the stability of the site; and
 - III. Additions, excavation or compaction of soil, rock or other materials.

The only scheduled site is A100 (S14/179), a Group 2 Archaeological and Cultural Site, as previously noted when the application was assessed with reference to Policy 19.2.4 (refer to 4.19). Group 2 sites are identified for information purposes in the Operative Plan. Rule 19.3y permits earthworks on a Group 2 archaeological and cultural sites subject to other standards in the Operative Plan.

- 4.23 Policy 19.2.4d requires the relationships of tangata whenua with sites of spiritual, cultural or historical significance shall be recognised and provided for. The applicant has proposed a number of general mitigation measures in Appendix Q- Assessment of Archaeological Values and Effects to address this policy:
- a. Creation of a historic reserve that contains borrow pits;
 - b. Engagement of manawhenua in the development of interpretive records and/or markers, including pou or other installations; and
 - c. Recognition of the cultural relationship of Māori with the development area through place naming of trails and streets.

- 4.24 Policy 19.2.4e states, where features of significant cultural sites are lost, these features should be recorded and recognised through on-site marking to ensure the historical legibility of Hamilton City. As noted previously under Policy 19.2.4d (4.22 b and c), the applicant proposes on-site marking, interpretation and place naming.

- 4.25 Objective 23.2.5 stipulates, subdivision occurs in a manner that recognises historic and natural environments. This objective has been provided for in the identification of archaeological sites in the archaeological assessment reports, the proposed mitigation mechanisms, and the retention of archaeological features, Maori borrow pits and deposits in a proposed historic reserve.

4.26 Policy 23.2.5a(ii) requires, subdivision avoids, remedies or mitigates adverse effects on: i. scheduled heritage items and ii. scheduled archaeological and cultural sites. As noted in the discussion of Policies 19.2.4a and 19.2.4c the only scheduled site is A100 (S14/179), a Group 2 Archaeological and Cultural Site. Group 2 sites are included in the Operative Plan Schedule for information. Rule 19.3y (Activity Status Table) permits earthworks on a Group 2 archaeological and cultural sites subject to other standards in the Operative Plan.

5.0 Response to Submissions

5.1 Five submissions relevant to archaeology have been lodged. These are summarized in Attachment 1. Three submissions support part or all of the archaeological conditions set out in the application documents (submitters #41 Sonny Karena of the Tangata Whenua Working Group, #60 Rawiri Bidois of Te Haa O Te Whenua O Kirikiriroa, and #62 Heritage New Zealand Pouhere Taonga). The specific conditions sought by Heritage New Zealand are provided for in the Addendum to the Archaeological Assessment and in the conditions recommended in this evidence as 7.1.8 and 7.1.9.

5.2 Two submitters opposed the development of the subdivision. Submitter #76 Tania Macdonald opposed based on the destruction of significant Māori archaeological sites. Submitter #80 Justine Young opposed the application based on adverse effects under RMA6(f), the Waikato Vision and Strategy te ture Waimana O Waikato, and the lack of enhancing the cultural and historical site location. She sought withdrawal of the application and amendments. The proposed amendments include acknowledgement of the Māori garden sites and setting aside open space in addition to the proposed archaeological reserve. In my opinion the Maori garden sites have been acknowledged as part of the archaeological assessment and the proposed historic reserve, and will receive additional acknowledgement as part of the archaeological investigation and the interpretive records/ markers and place naming by tangata whenua. I have recommended specific conditions that relate to acknowledgement of the Māori garden sites and tangata whenua recognition, 7.1.1 through 7.1.3 and 7.1.6 through 7.1.10.

6.0 Evidence Summary and Conclusions

6.1 My evidence has been presented as a detailed review of the statutory provisions relevant to archaeology in the Amberfield subdivision development area and included my professional comments. In that regard the main points are summarized in the following.

6.2 It is my opinion that the archaeological assessment process was thorough and provides sufficient information to address RMA Section 6f matters, the RPS Policy 10.3, 10.3.1 and assessment criteria 10A; as well as relevant HCC Operative Plan and Peacocke Structure Plan Objectives, Policies and Rules.

The assessment identifies eleven discrete Maori horticultural site areas in the Amberfield subdivision development area based on a tabletop study and archaeological field work. The only site scheduled in the Operative Plan is A100 (S14/179), a Group 2 Archaeological and Cultural Site. Rule 19.3y permits earthworks on Group 2 sites. The evaluation of the site(s) significance and the stand alone evaluation of the proposed historic heritage reserve using the RPS Table 10.1 criteria is congruent and well thought out.

6.3 I agree with the determined that the archaeological values of the eleven site areas affected by the development earthworks sites are associated with the information they contain and vary contingent on post Māori land use. Based on this the primary mitigation proposed, systematic archaeological investigation and recording, is an appropriate action to remedy the loss of archaeological information as a result of earthworks. Heritage New Zealand Pouhere Taonga has issued a 10 year authority (Authority no. 2019/069) for the mitigation of effects for the eleven sites, or parts thereof in the Amberfield Subdivision.

6.4 Other mitigation measures are also proposed by the applicant to offset the loss of the archaeological sites areas. These include:

a. Setting aside land in the subdivision as Historic Reserve that has a management plan based on the principles of the New Zealand ICOMOS Charter. [RPS Policy 10.3.1, Peacocke Structure Plan Policy 3.4.1.15a and 3.4.1.15b, and the Operative Plan Policies 19.2.1c, 19.2.4d, and Policy 23.2.5a(ii).]

- b. Cultural recognition expressed in place, trail and street naming. [Peacocke Structure Plan Policy 3.4.1.15b and Operative Plan Policies 19.2.4d and 19.2.4e].
 - c. The development of interpretive records in conjunction with manawhenua that could include interpretation panels, pou or other installations. [Peacocke Structure Plan Policy 3.4.1.15b and the Operative Plan Policies 19.2.4d and 19.2.4e.]
- 6.5 The five submissions that contained archaeological issues have been considered and in my view are appropriately addressed by the mitigation measures proposed by the applicant and the recommended conditions that will provide positive archaeological heritage effects.

7.0 Recommended Conditions

The conditions I am recommending provide a framework for ensuring the archaeological heritage management principles and intent of the RMA, RPS, and the Hamilton City Council Operative Plan and are adhered to during the development of the Amberfield Subdivision. A number of the conditions have been proposed by the applicant and submitters.

- 7.1.1 Prior to the Stage 1 earthworks commencing the applicant shall survey and mark out the boundary of the Historic Reserve and carryout the legal transfer of the reserve land title to Hamilton City Council. *[Policy 3.4.1.15a and Policy 19.2.4a]*
- 7.1.2 Comply with the archaeological authority (2019/069) obtained under the Heritage New Zealand Pouhere Taonga Act 2014; *[Policy 23.2.5a9(ii)]*
- 7.1.3 Ensure that iwi representatives are notified of the proposed commencement of construction works; *[Policy 19.2.4d]*
- 7.1.4 Prior to the Stage 1 earthworks commencing the consent holder shall submit to HCC, for record purposes only, an Archaeological Sites Management Plan and Research Strategy prepared by a suitably qualified and experienced archaeologist. *[Policy 19.2.1b and 23.2.5a(ii)]*

7.1.5 Manage archaeological site access and construction work where affects to archaeological site have not been mitigated and on the Historic Reserve.

a. Prior to the construction works for each stage a protective fence (or fences) and warning signage shall be erected around the archaeological sites to be managed and protected. These fences shall be retained for the duration of all construction works in vicinity of the respective archaeological site. *[Policy 23.2.5a]*

7.1.6 Submit annually to HCC a copy of the Annual Archaeological Review report require under Authority 2019/069 to assist HCC in monitoring sub-division effects. *[Policy 19.2.1b and 23.2.5a(ii)]*

7.1.7 Submit a copy of the Final Archaeological Report to HCC, for deposit in the Hamilton City Public Library to ensure the historic legibility of Hamilton City. *[Policy 19.2.1b]*

7.1.8 Prior to occupation of any buildings within Stage 1, the consent holder shall submit to HCC a Historic Reserve Management Plan (RMP). The objective of the RMP is to set out how the archaeological sites will be managed in the future using ICOMOS Charter NZ 2010 conservation principles so that sites do not suffer damage due to earthworks, landscaping and use. *[Policy 19.2.1c, 19.2.4c, 19.2.4d, and 19.2.4e]*

a. The RMP should include the Historic Reserve and Esplanade Reserve areas.

b. The RMP content shall include, but not be limited, to:

- i) The management goals, policies and actions identified to protect the site(s) in perpetuity;
- ii) What controls will be put in place to manage access to the site(s);
- iii) Site(s) interpretation and public engagement policies;
- iv) Recognition of archaeological site statutory requirements under the Heritage New Zealand Pouhere Taonga Act 2014 for earthworks including site interpretation; and
- v) Who will be notified and the remedial action undertaken in the event of damage.

c. The consent holder shall consult, involve, and obtain feedback from the Waikato-Tainui Iwi and Heritage New Zealand on the detail in the RMP prior to submitting the document to HCC. Evidence of the outcomes of these consultations/ meetings and feedback received shall be provided within the RMP. *[Operative Plan Policy 19.2.4d and Peacockes Structure Plan Policy 3.4.1.15b]*

7.1.9 Prior to occupation of any buildings within Stage 1 the consent holder shall prepare a Historic Heritage Interpretation Strategy for the Historic Reserve and larger Amberfield Subdivision. The work shall involve consult with Waikato-Tainui representatives and include the development of specific interpretive records these may include: interpretive signage, markers such as pou, or other types of installations as well as cultural recognition through place, trail and street naming. *[Operative Plan Policy 19.2.4d and 19.2.4e Peacockes Structure Plan Policy 3.4.1.15b]*

7.1.10 If koiwi or taonga (treasured or prized possessions, including Maori artefacts) or archaeological sites are discovered in any area being earth-worked, the consent holder shall cease work within a 10m radius of the discovery immediately and follow the Hamilton City Council Archaeological Sites and Accidental Discovery Protocols in Volume 2 Appendix 8-2. *[Rule 19.4.2; Vol 2 Appendix 8-2]*

Alexandra Lee Simmons

4 March 2019

Attachment 1 Summary of Submissions Relating to Archaeology

Table 1 Summary of Submissions Relating to Archaeology

Contact Name & Submission #	Address	Stance		Archaeological Issues and Decision(s) Sought
		opposed part or all	Supported part or all	
Sonny Karena, Tangata Whenua Working Group (#41)	72 Mardon Rd Hamilton 3214		√	<p><u>Archaeological Issue</u>- Tangata whenua consultation process and mitigation measures.</p> <p><u>Decision Sought</u>–Consent granted with conditions that reflect the mitigation set out in the Cultural Impact Assessment (CIA) and as contained within the application documents.</p>
Rawiri Bidois, Te Haa O Te Whenua O Kirikiriroa (#60)	781b Bruntwood Rd, Tamahere Hamilton 3283 THOTWOK address PO Box 13054, Hamilton 3251		√	<p><u>Archaeological Issue</u>- Tangata whenua consultation and mitigation measures that provide for Iwi issues.</p> <p><u>Decision Sought</u>- Grant consent.</p>
Carolyn McAlley, Heritage New Zealand PO Box 13339 Tauranga 3141 (#62)			√	<p><u>Archaeological Issue</u>- Proposed activity will have an adverse effect on historic heritage, in particular archaeological sites recorded and unrecorded.</p> <p><u>Decision Sought</u>- Consent granted with conditions:</p> <p>(a) Assessment of the archaeological site in the heritage reserve against the criteria of the Waikato Regional Policy Statement Table 10.1 to determine significance.</p> <p>(b) Development of a reserve management plan using ICOMOS Charter NZ 2010 principles in consultation with Heritage New Zealand.</p> <p>(c) Preparation of a Historic Heritage Interpretation Strategy for the heritage reserve and larger Amberfield Subdivision.</p> <p>(d) If the application is approved an advice note should be included advising in the event of works on an archaeological site within the Heritage Reserve, including installation of interpretation, signage, pou.</p>

Tania Macdonald (#76)	60A Malcolm Street Hamilton 3216	√		<p><u>Archaeological Issue</u>-Destruction of significant Māori archaeological sites.</p> <p><u>Decision Sought</u>- Nothing specified in relation to the loss of archaeological sites</p>
Justine Young (#80)	1 Silva Crescent Hamilton 3216	√		<p><u>Archaeological Issues</u>- Adverse effects RMA 6(f); not in keeping with Waikato Vision & Strategy te ture Whaimana O Waikato objectives b, e, i; and the application does not make provision for actively enhancing the cultural and historical site location and significance to Maori.</p> <p><u>Decision Sought</u>-Withdraw the application and amend to acknowledge and value the significance of the Maori garden sites in this part of Waikato-Tainui Land. Set aside open space in addition to the proposed archaeological reserve.</p>