

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
APPOINTED BY THE HAMILTON CITY COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991 (**Act**)  
**AND**

**IN THE MATTER** of an application for subdivision and land use  
consent for the Amberfield development  
pursuant to the Act.

**APPLICANT** Weston Lea Limited

**CONSENT AUTHORITY** Hamilton City Council

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**EVIDENCE-IN-CHIEF OF WARREN JOHN GUMBLEY  
FOR WESTON LEA LIMITED**

**Dated: 12 April 2019**

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## SUMMARY OF EVIDENCE

1. My name is Warren John Gumbley and I am an archaeologist. I summarise my evidence as follows:

### ***Archaeological Data***

*(Page 6)*

- (a) Desktop and field investigations were undertaken to determine the archaeological values within the Amberfield development area. The investigations revealed 11 discrete Māori horticultural sites distributed across the entirety of the proposed development area.
- (b) The archaeological remains identified and the archaeological values relevant to the Amberfield development site all relate to Māori occupation.

### ***Assessment of Archaeological values***

*(Page 15)*

- (c) The archaeological deposits within the Amberfield development area are a mosaic of preservation states with some areas well-preserved while others are poorly preserved. The areas vary in extent from 0.04 ha to 11.6 ha with a total aggregation area of approximately 32 ha.
- (d) The sites identified are all sites of Māori horticultural activity and form typical elements of the Waikato Horticultural Complex, which is a distinctive technological adaptation to the problems of growing tropical cultigens in a temperate climate.
- (e) Pā form the other mainstay of this archaeological landscape. While there are a number of pā surrounding the development area, at what was a relatively high density, none are on the site and therefore no pā are directly affected by the development.

### ***Assessment of effects on archaeological values and proposed mitigation measures***

*(Page 16)*

- (f) The nature of the development means that all but approximately 4 percent of the identified archaeological deposits will be destroyed. The remainder will be protected in a reserve.

- (g) The effect will, therefore, be adverse for the archaeological sites and the already significantly diminished local (southern Hamilton and Tamahere) archaeological landscape to a moderate level. These adverse effects cannot be avoided because of the non-renewable nature of archaeological sites. However, I consider the proposed mitigation will adequately address the adverse effects of the proposal on the site's archaeological values.
- (h) Mitigation will take two principal forms: the detailed archaeological investigation and recording of the archaeological deposits to be destroyed; and the preservation of 1.6 hectares of this archaeology in a future reserve. The reserve will preserve a representative portion of the archaeological features.
- (i) On 29 August 2018 Heritage New Zealand Pouhere Taonga granted an Authority (2019/69) permitting the destruction of the archaeology within the proposed development area, except in the area of the proposed archaeological/cultural reserve. In granting Authority 2019/69 Heritage New Zealand have demonstrated that they are satisfied that the archaeological values are such that mitigation through archaeological investigation, along with preservation of representative part of the archaeology and interpretation of the archaeological landscape balances the loss of archaeology. Authority 2019/69 is subject to nine conditions relating to the undertaking of detailed archaeological investigations referencing the Archaeological Site Management Plan and Archaeological Research Strategy submitted with the application to Heritage NZ; contractor briefings; provisions and protocols for discovery of kōiwi (human remains); adherence to tikanga Māori; and reporting requirements.

## INTRODUCTION

2. My name is Warren John Gumbley.
3. I am Principal Archaeologist for W. Gumbley Limited. I hold the qualifications of BA(Hons), MA(Distinction) and am currently preparing a thesis for a PhD at The Australian National University on the adaptation of Polynesian horticulture to New Zealand.
4. I have worked as an archaeologist since 1982 and in the Waikato since 1991, except for two years (1994 and 1995) when I was the national Archaeologist for the then New Zealand Historic Places Trust. I have worked as a consultant archaeologist since 1996 and am very familiar with the archaeological landscape of the Waikato.
5. I have been retained by Weston Lea Limited to prepare a statement of evidence on its application for land use and subdivision consent from the Hamilton City Council (**HCC**) for the Amberfield development.
6. I am familiar with the application site and surrounding environment having first visited part of the future Amberfield site in 1997. In relation to this project I have visited the site on numerous occasions, including in the course of an extensive site investigation programme designed to gather data about the nature and extent of the archaeological deposits within the proposed Amberfield subdivision.
7. In preparing this evidence I have read the following documents:
  - (a) Amberfield – Assessment of Archaeological Values and Effects (W. Gumbley and M. Laumea; 10 April 2018) (Appendix Q of the Assessment of Environmental Effects (**AEE**)), referred to in this evidence as the archaeological assessment report;
  - (b) Addendum: Amberfield – Assessment of Archaeological Values and Effects (W. Gumbley and M. Laumea; 27 July 2018) (Appendix C to the section 92 Response);
  - (c) Heritage New Zealand Pouhere Taonga archaeological authority 2019/069 dated 29 August 2018;

- (d) Relevant submissions; and
  - (e) The Council officer's section 42A report; and
  - (f) Statement of evidence by Dr Alexandra Lee Simmons dated 4 March 2019 attached to the section 42A report.
8. I prepared the archaeological assessment report, along with the Addendum report. I was also responsible for obtaining the Heritage New Zealand Pouhere Taonga archaeological authority.

#### **CODE OF CONDUCT**

9. I have read the Environment Court Code of Conduct for expert witnesses and agree to comply with it.
10. I confirm that the topics and opinions addressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

## ARCHAEOLOGICAL DATA

11. In order to assess the effects of the proposed subdivision and prepare the archaeological values and effects assessment for the AEE, I acquired archaeological data to identify the archaeological resources within the Amberfield development area.
12. Broadly, this process fell into the following stages:
  - (a) The first stage was the undertaking of a desktop study; and
  - (b) This was followed by a programme of fieldwork, which itself was undertaken in two stages including:
    - i. a pedestrian survey of the development area; and
    - ii. the excavation of a series test trenches to examine the identified archaeology and to verify the status of areas where the archaeological status was uncertain.

### *Desktop study results*

13. The desktop research employed the following resources: previous archaeological records relating the Peacockes area; historic maps; and plans and soil survey data. This background material is discussed in detail in pages 10 to 38 of the archaeological assessment report and a summary is set out as follows.
14. In the 1930s the Soil Bureau of the Department of Scientific and Industrial Research (**D.S.I.R.**) carried out an extensive and detailed soil survey of Waipa County, which included the area encompassed by the Amberfield development. During this survey the soil scientists identified a distinct anthropogenic<sup>1</sup> soil found mostly along the banks of the Waikato River. Today these soils have been classified as the Tamahere Series and are described as a black gravelly sand overlying a natural sandy loam.
15. In the archaeological assessment report (and this evidence) they are referred to as Māori-made soils. The D.S.I.R. soil scientists identified that this soil was

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<sup>1</sup> Human (in this case Māori) manufactured or created soil.

created by Māori through quarrying and transporting the alluvial sand and gravel present under the tephra-genic sandy loams. The quarries were identified as the associated sub-conical holes we call borrow pits. Our present-day understanding the fundamental morphology of this agricultural system has not altered since it was first described in the Soil Bureau report, but it is becoming significantly more nuanced. Currently we understand the process to be more complex than the simple process assumed by soil scientists in the mid 20<sup>th</sup> century. As part of the soil survey, areas of Māori-made soil were identified within the Amberfield development area.

16. The New Zealand Archaeological Association site recording scheme was also consulted and contained records of four archaeological sites within the Amberfield area (S14/176, S14/224, S14/319 and S14/64) and that another was located with a grid reference located on the Waikato River which may have related to horticultural sites present on either side of the river (S14/318).
17. Each of these sites had been recorded on an ad hoc basis since the 1970s. Three were horticultural sites represented by Māori-made soils and borrow pits (i.e. horticultural sites), S14/176, S14/224 and S14/319, while the fourth was recorded as a pā. Closer examination of the site record referring the pā (S14/64) showed that it had originally been recorded in 1977 from aerial photography dated to the 1960s. A visit to the S14/64 showed it was mis-identified as a pā and that it is also a horticultural site with the visible features of borrow pits located in the neighbouring Allotment 87 while the Māori-made soils extend into the Amberfield area.
18. I also undertook a review of the 19<sup>th</sup> Century survey maps and plans for the area. This review revealed no useful information relevant to the current investigations.
19. 1940s aerial photographs along with recent (2008) LiDAR survey data were also reviewed to identify borrow pits as markers of horticultural sites and the earthworks of pā. Eighty-seven probable and possible borrow pits were identified within the proposed development area in several clusters.
20. No pā were identified within the development area but an important pā, Nukuhau, is located immediately to the south of the development area and is

very likely to have an association with some of the horticultural sites within the development area.

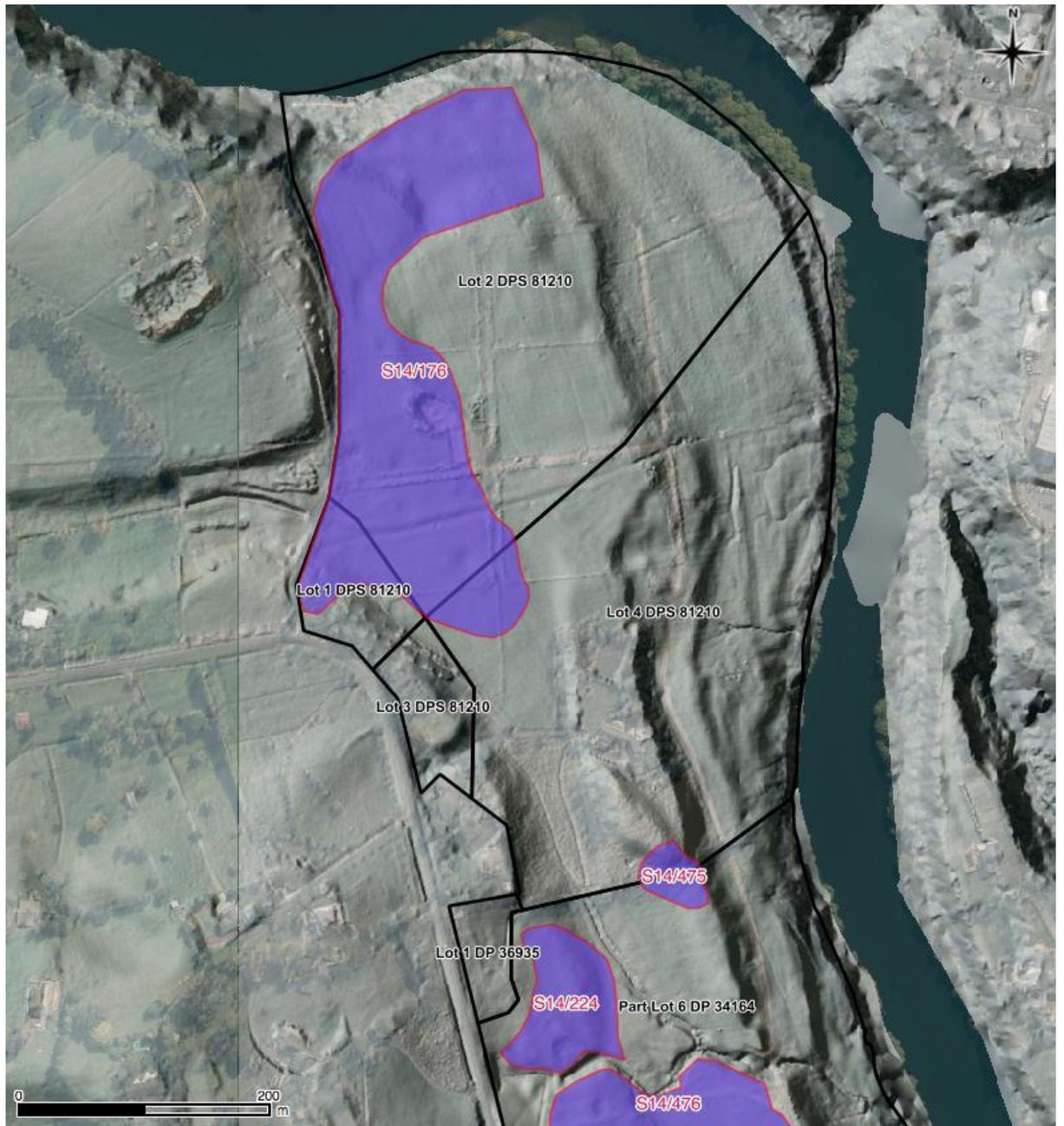
21. A map of land-use history within the Amberfield development area was also compiled from the records and from information supplied by Mark Peacocke. This was done to enable consideration of possible impacts on archaeological sites and the potential effects of these on archaeological values.

***Programme of fieldwork***

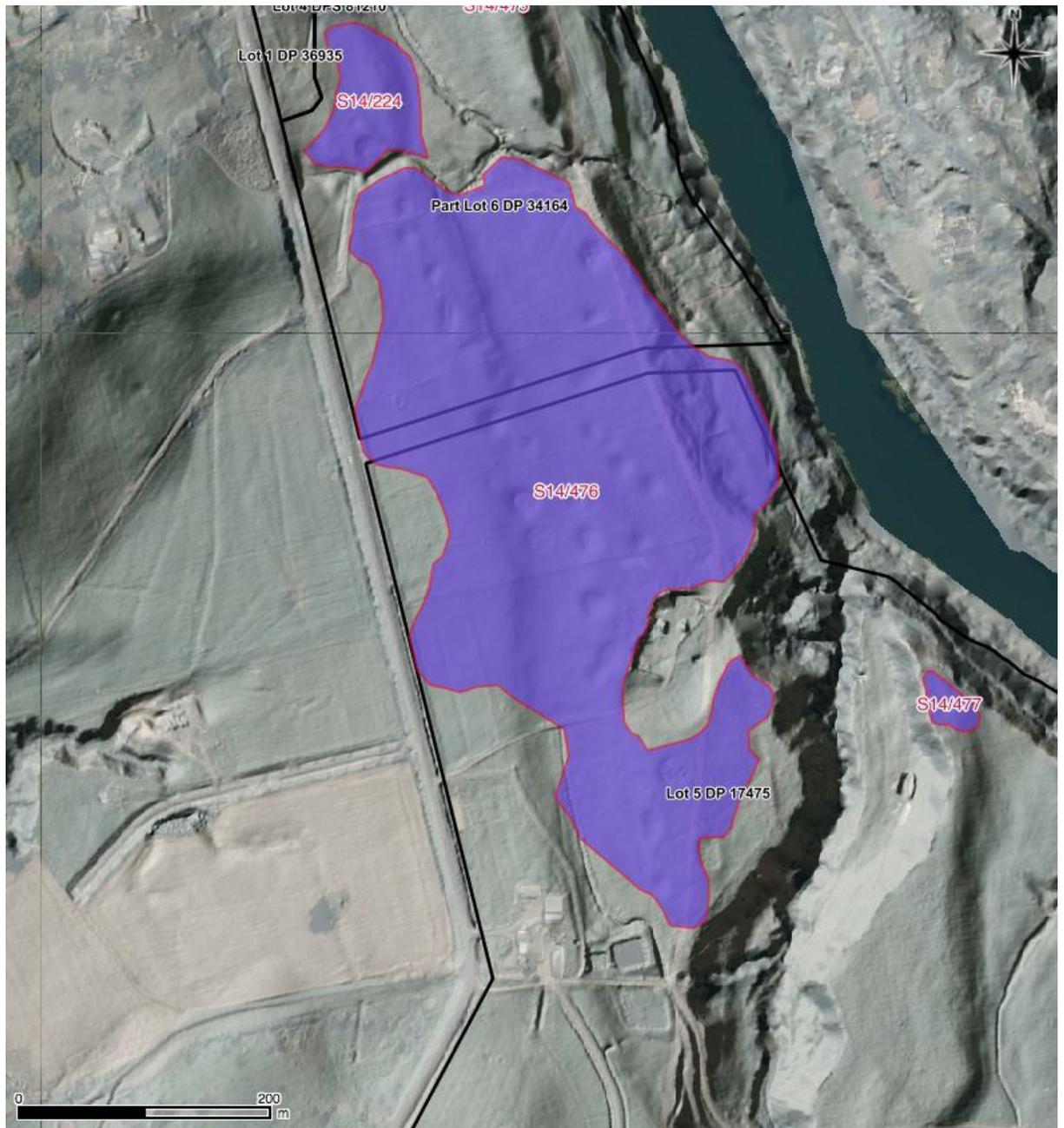
22. The fieldwork component of the assessment is described in detail on pages 39 to 47 of the archaeological assessment report.
23. Further information was requested by Hamilton City Council in relation to the geotechnical test-pits and this was supplied in the addendum to the archaeological assessment report (pages 2 to 7) (Appendix C to the section 92 response).
24. The following is a summary of the programme of fieldwork that was undertaken which is further described in these two reports.
25. An archaeological survey of the Amberfield development area was carried out between December 13 and December 19 2017. Investigations involved two components:
  - (a) systematic pedestrian auger survey of areas of archaeological potential; and
  - (b) monitoring and recording of test pits excavated for geotechnical investigations.
26. The pedestrian survey was guided by the results of the desktop survey and was comprehensive with almost the entirety of the development area examined. Areas not examined were those where the land-use study indicated that any potential archaeology would have been destroyed. This survey included the use of a soil auger to identify the location and extent of the Māori-made soils, and to gain some insight into their general state of preservation. Altogether, 741 soil auger samples were examined.

27. This work indicated 11 spatially distinct areas of Māori-made soil were present within the proposed development area. Maps 1 to 3 show the locations and extents of the identified archaeological sites.

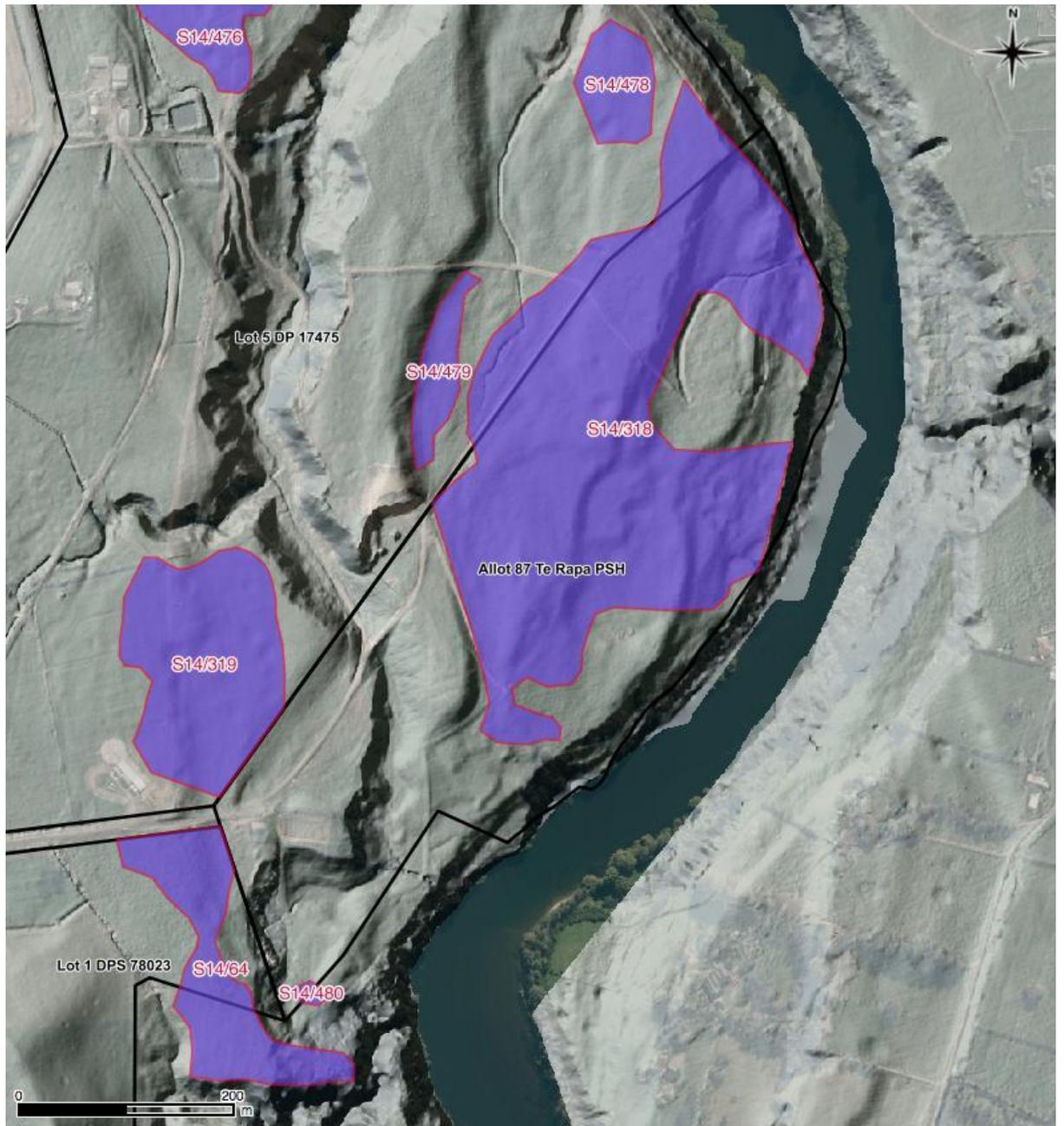
**Map 1:** Map showing the locations and extents of archaeological sites S14/176, S14/475 and S14/224.



**Map 2:** Map showing the locations and extents of archaeological sites S14/476 and S14/477.



**Map 3:** Map showing the location and extents of archaeological sites S14/478, S14/479, S14/318, S14/319, S14/480, S14/64.



28. In addition, 15 of the geotechnical test trenches were examined where these were located within or adjacent to suspected archaeological deposits. The trenches were used to clarify both the nature of the archaeology and its state of preservation.
29. Overall the archaeological deposits within the Amberfield development area are a mosaic of preservation states with some areas well-preserved other poorly preserved. The historic aerial photographs also identified areas of archaeological deposit that have been destroyed by farm infrastructure development or sand quarrying.
30. The 11 discrete Māori horticultural sites are distributed across the entirety of the proposed development area.
31. Altogether, these areas varied in extent from 0.04 ha to 11.6 ha with a total aggregation area of approximately 33.4 ha.

#### ***Overview and context***

32. The archaeology of the Waikato Region and the nature of the local archaeology is discussed in detail in the archaeological assessment report (pages 16 to 38).
33. The archaeology of the Hamilton/Tamahere area is relatively rich and dense, although this archaeological landscape has been damaged by urban and peri-urban development. Pre-European Maori horticultural sites along with associated pā comprise the back-bone of this landscape.
34. The Waikato horticultural system, featuring Māori-made soils and borrow pits, extends downstream from Arapuni to just upstream of Meremere, approximately 110 km. Eighty percent of the sites belonging to this horticultural system are found within 1 km of the Waikato River, with the remainder located along the banks of the Waipā River and other tributaries.
35. Archaeological investigations have shown the development of this horticultural landscape to be prolonged, complex, and, by New Zealand standards, intensive. For example, we know from archaeological fieldwork that quarried alluvium was used and applied in at least two ways, both quite

distinct, although the understanding of the agronomic process<sup>2</sup> is limited. Both uses of the quarried alluvium appear to have been used at the same time and with no specific spatial distinction (i.e. both types of applications have been found across the Middle Waikato Basin where most of the sites of the Waikato horticultural system have been found).

36. Examination of plant micro-fossil remains (starch grains, xylem cells, raphides, etc.) sampled from the garden sites show that kumara was generally grown but the remains of taro have also been found at some sites.
37. The borrow pits themselves vary significantly in size. The smallest represent the remains of initial quarrying efforts and are often little over a metre deep and less than a metre in diameter, whereas the largest borrow pits can be 40 m in diameter and up to 5 m deep. The deepest borrow pit identified archaeologically has been 6.5 m deep.
38. Typically, the 'average' borrow pits are 15 to 20 m in diameter and 3 to 4 m deep. This means that the amount of material being quarried from borrow pits that are large enough to be visible on the ground surface appears to be in the range of 800-1200 m<sup>3</sup> per borrow pit. I have identified from historic aerial photographs and LiDAR data over 6300 borrow pits in the Waikato horticultural system. Using a conservative estimate of the volume of quarried material from each pit of 600 m<sup>3</sup>, this represents approximately 3,800,000 m<sup>3</sup> of quarried sand and gravel transported to and incorporated into the gardens of the Waikato horticultural system, all accomplished with traditional tools and baskets.
39. Associated with the horticultural sites there is evidence of associated crop storage structures, in the form of very various types of pits. We also find clusters of archaeological features such as post holes, fireplaces and pits that represent areas of domestic occupation focused on the gardens. These appear to constitute temporary or seasonal kāinga occupied by the people who maintained the gardens.
40. Radiocarbon dating indicates that the Waikato horticultural system began to be developed in the Inland Waikato by around 1500 A.D., at about the same

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<sup>2</sup> The process of soil and crop production. More esepcifically, in this context it refers to forest clearance, garden preparation (inlcuding soil manufacture), crop harvest and storage.

time traditional history tells us Tainui migrated inland from the Kāwhia and Aotea harbours.

### **ASSESSMENT OF ARCHAEOLOGICAL VALUES**

41. The archaeological values associated with the archaeological sites within the Amberfield development area have been discussed in detail in the archaeological assessment report (pages 48 to 50).
42. Because all of the identified archaeological sites are of the same class, I have assessed the archaeological values as a single unit. This is appropriate, as while there is variation in the preservation of the archaeological deposits, each site (forming a discrete aggregation of archaeological deposits) is internally variable with none exhibiting apparent variation from the whole. It should be born in mind that it is axiomatic that all archaeological sites are damaged or modified to some degree. I have assessed archaeological values with reference to the heritage assessment criteria detailed in the Waikato Regional Policy Statement (Table 10-1: Historic and cultural heritage assessment criteria). I provide a summary of the salient elements of my assessment of the archaeological values.
43. As a general characterisation, the archaeological sites within the Amberfield development footprint are representative of the archaeological landscape associated with the Waikato horticultural system albeit without the presence of a pā (although these are present in the surrounding landscape).
44. Because the archaeology within the development area is overwhelming associated with pre-European Māori horticulture it has the potential to provide valuable information about Māori horticultural practice, not just specifically relating to the Waikato but also of relevance to New Zealand archaeology. The two principal relevant themes concern agronomic practice and the timing of the development and spread of these horticultural practices. More broadly, the sites within Amberfield, along with other sites of the same type within the Waikato, can contribute to understanding the process of adaptation of a fundamentally tropical horticultural system to the temperate climate of New Zealand. This has long been considered a central theme in New Zealand archaeology.

45. The testing fieldwork described above has indicated that the condition of the archaeological deposits is variable across the wider Amberfield development area. The areas with poor preservation have limited archaeological value, although experience indicates that some useful archaeological information may be recoverable. The better-preserved areas of archaeology have the potential to provide valuable and potentially unique information.

#### **ASSESSMENT OF EFFECTS ON ARCHAEOLOGICAL VALUES AND PROPOSED MITIGATION MEASURES**

46. Except for the allocated reserve area, the development of Amberfield will be extensive and relatively intensive with respect to the archaeological landscape within the project area.
47. The archaeological deposits represented by the identified archaeological sites S14/64, S14/176, S14/224, S14/319, S14/475 to S14/480 will be destroyed. Most of S14/318 will also be destroyed, but part of the site is proposed for preservation as a reserve (as discussed below). The area of the proposed reserve is 1.6 hectares which is 4 percent of the identified area of archaeological deposits. I note that in the conclusions of the assessment report (*Amberfield – Assessment of Archaeological Values and Effects* 10 April 2018, Appendix Q of the AEE) the percentage of archaeological deposits was incorrectly given as 0.15 percent of the total archaeology. Here, I had recorded the area of the reserve as a proportion of the overall Amberfield project area. I note also that in Dr Simmons' evidence she refers to the reserve constituting 15 percent of the total archaeology. I assume that this is a misunderstanding of the 0.15 percent stated in the conclusions of the April 2018 report.
48. In addition to the reserve, mitigation will take the form of cultural recognition expressed in place, trail and street names and a series of interpretive records developed in conjunction with mana whenua. It is anticipated that these may take the form of interpretation panels, pou, or other installations.
49. Mitigation will also take the form of archaeological investigations, as per the requirements of the Heritage New Zealand Archaeological Authority.

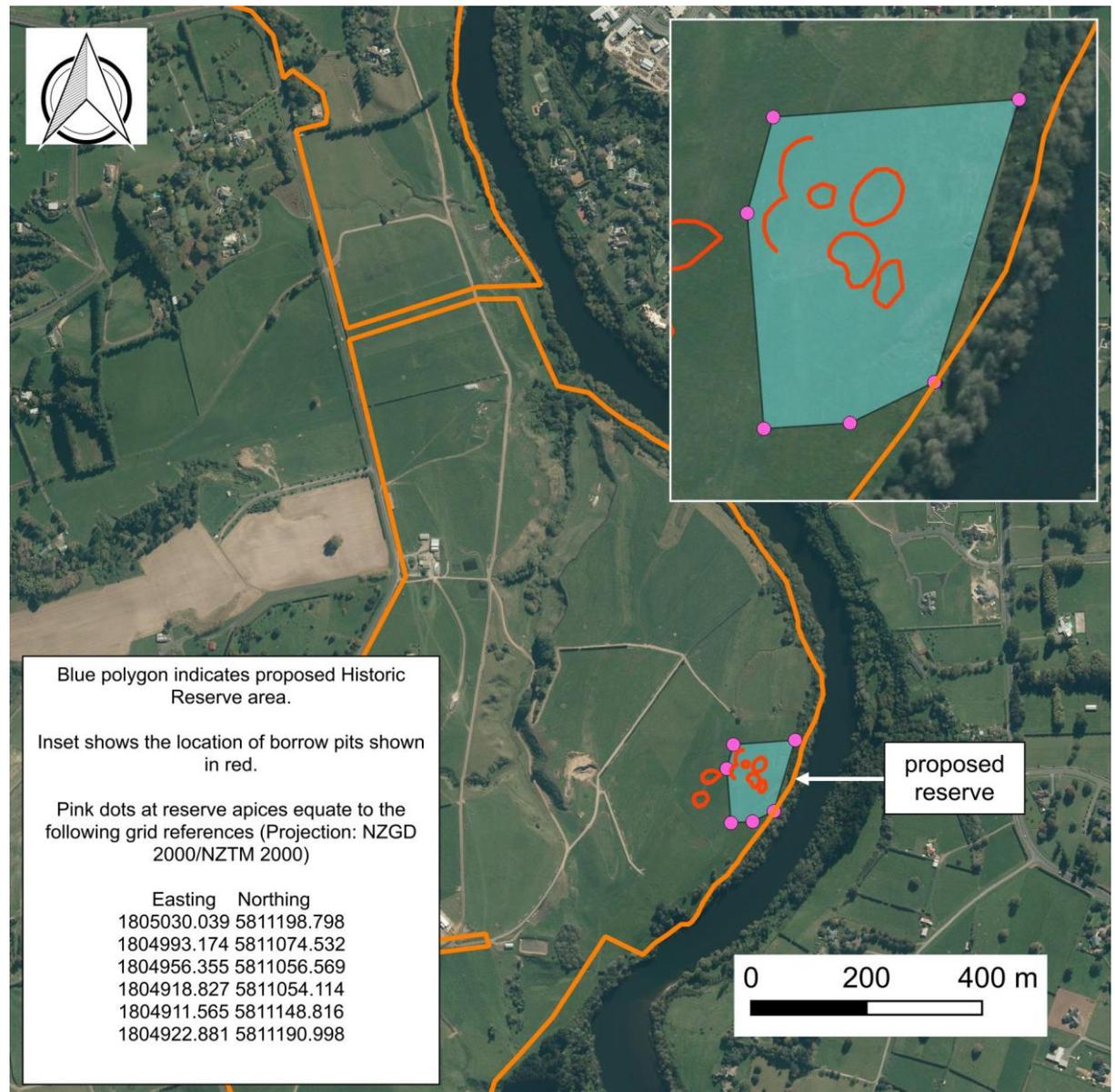
50. Heritage New Zealand has granted an Archaeological Authority (2019/69) for the development of Amberfield. The Authority specifies nine conditions that must be followed during the development of Amberfield. Broadly the requirements fall into two classes:
- (a) those relating to archaeological investigations and data recovery; and
  - (b) those relating to the control of activities that effect archaeological deposits.
51. Archaeological investigations will be carried out as specified in the Amberfield Mitigation and Research Strategy, which must be reviewed annually. This document describes the underlying research strategy and the fieldwork methodology along with the post-excavation analyses to be applied by the Project Archaeologist. As well as what may be termed pro-active or pre-emptive archaeological investigations, it allows for the monitoring of all earthworks by the Project Archaeologist. Conditions requiring the updating of the national archaeological site database (N.Z. Archaeological Association Site Recording Scheme) and reporting are also included.
52. A contractor briefing is to be undertaken to familiarise contractors with the protocols for managing known and unidentified archaeological deposits, including the finding of koiwi (human remains). These measures are specified within the Amberfield Archaeological Site Management Plan (**ASMP**), which is specifically referred to in Condition 2 of the Heritage NZ Authority 2019/62. The ASMP defines the roles the authority holder, contractor(s) and the Project Archaeologist. It establishes protocols for preventing damage to archaeological deposits prior to 'clearance' from the Project Archaeologist (for example, the erection of temporary barrier fencing), and protocols for incidental archaeological finds. The ASMP is to be reviewed at least annually and may be altered with written permission from Heritage NZ. The Authority also specifies that work must be undertaken in conformity with tikanga Māori.

### ***Proposed Heritage Reserve***

53. The proposed reserve area is a well-preserved and representative example of the Māori horticultural landscape that has been proposed for exclusion from the development and to be protected within a reserve.

54. It is located at the south-eastern corner of archaeological site S14/318 and sits on the lower two river terraces, therefore directly overlooking the Waikato River (the location of the proposed reserve within the wider development area is shown in Map 4 below). The area of the proposed reserve is approximately 1.6 hectares, which represents 4 percent of the total identified archaeological deposits.

**Map 4:** Location and details of the proposed reserve.



55. The proposed reserve has been assessed as a stand-alone unit against the RPS heritage assessment criteria as detailed in the addendum to the

archaeological assessment report (pages 11 to 15). I summarise the salient points as follows.

56. Geotechnical test-pit 4 has demonstrated that the archaeological deposits in this area are well-preserved. The proposed reserve includes both Māori-made soils and borrow pits, which are visible on the ground surface. Therefore, it contains the fundamental elements typical of sites of the Waikato Horticultural Complex and is representative of archaeological landscapes that are significant on both regional and national scales. The proposed reserve also has significant associative values with view-shafts linking it to the Waikato River and upstream to Nukuhau Pā. It also has high potential values for educational and interpretation outcomes.
57. Mana whenua have voiced their desire to use the area for appropriate cultural symbolism relating to the place and the surrounding cultural landscape.
58. A reserve management plan will be developed following ICOMOS charter principles.
59. It is intended that the proposed heritage reserve will be transferred to the HCC as an Historic Reserve for future management, curation and protection. The designation of the reserve as an Historic Reserve is considered important as this reflects both the nature and significance of the remains present and helps to ensure appropriate management practices.
60. No development within the reserve (for example, tracks or cultural symbolism) will be possible without a new archaeological authority from Heritage New Zealand.
61. The degree of effect to the archaeology may be described as moderate given the extent of the archaeology to be affected and its variable state of preservation and representative value as part of a significant archaeological landscape within the Middle Waikato Basin. The measures proposed to mitigate the effects are: detailed archaeological investigation; recording analyses and reporting; preservation of 4 percent of the archaeology within a reserve; cultural symbolism; and interpretation of the cultural landscape within the Amberfield area. It is my opinion that these measures adequately mitigate the adverse effects of the Amberfield development on historic heritage.

## ISSUES RAISED IN SUBMISSIONS

62. Tania McDonald (submission 76) opposes the application on the basis, in part, that Māori archaeological sites will be destroyed. The submitter does not propose a decision on this matter and the submission does not contain sufficient detail to specifically address any issues. I consider that the archaeological values have been adequately recognised through the mechanisms proposed; the archaeological investigation of remains and the preservation in a reserve of representative part of the archaeological deposits.
63. Justine Young (submission 80) has also opposed the application, proposing that it is inconsistent with the Waikato Vision and Strategy Te Ture Whaimana o Te Awa o Waikato and does not make provision for the cultural and historical site location and significance for Māori. I consider that this will be achieved through the archaeological investigations, reservation of a representative area of archaeological site, proposed development of cultural and historic interpretation, and installation of cultural symbolism.
64. Heritage New Zealand's submission (submission 62) was submitted prior to the Authority 2019/69 being granted. It has submitted that "the proposed activity will have an adverse effect on historic heritage" and "supports the proposed activities subject to the proposed heritage reserve remaining part of the proposal and the appropriate ongoing management of historic heritage, in particular archaeology".
65. Heritage New Zealand seeks the following: retention of the heritage reserve, development of the reserve management plan, an historic heritage interpretation strategy, and an advice note that any works within the heritage reserve will require an archaeological authority. These points are all consistent with the proposed mitigation measures.
66. It is clear that Heritage New Zealand supports the application provided the measures they have specified are incorporated. These measures are in accordance with those proposed by the applicant. Heritage New Zealand has stated in their submission that "*for mitigation to be considered commensurate to the destruction of such a large number of archaeological and cultural sites, Heritage New Zealand considers that the site to be retained must be significant.*" The assessment of the proposed reserve against the Regional

Policy Statement criteria demonstrates that the area has significant archaeological values. In other words, the area of the reserve is as significant as any other area of archaeology within the development and is more significant than others.

67. Both Sonny Karena, on behalf of the Tangata Whenua Working Group (submission 41), and Rawiri Bidois, on behalf of Te Hā o Te Whenua o Kirikiriroa (submission 60), have submitted in favour of the project. This was the outcome of a process of consultation with manawhenua in which I was an active participant.

### **ISSUES RAISED IN SECTION 42A REPORT**

68. I have reviewed the section 42A report and evidence of Dr Simmons.
69. Dr Simmons agrees with determination of the archaeological values and the proposed mitigation measures presented as part of the application for Amberfield. From my perspective as an archaeologist, Dr Simmons, in her S42A report, clearly and thoroughly considers the information presented as part of the application and reviews it against the relevant elements of the Waikato Regional Policy statement, the HCC Operative District Plan and the HCC Peacockes Structure Plan. I agree with Dr Simmons conclusions.
70. Seven conditions have been proposed by HCC in the S42A report in relation to heritage and archaeological site management. As an archaeological and heritage management professional I find the proposed conditions comprehensible and relevant as appropriate mitigation and management measures within the context of the Amberfield development.
71. The conditions are also consistent, and do not conflict, with the conditions the Heritage New Zealand Pouhere Taonga Authority 2019/69.

### **CONCLUSION**

72. In summary, I conclude that:
- (a) A total of 32 hectares of archaeological deposits, clustered as 11 archaeological sites have been recorded within Amberfield development area. These archaeological sites are all related to the

horticultural practices employed in the inland Waikato prior to European settlement and are typical of such sites.

- (b) All but 4 percent of the identified archaeological sites will be destroyed in the course of the development of Amberfield. Mitigation for the adverse effects will take two principal forms; the detailed archaeological investigation and recording of the archaeological deposits to be destroyed, and the reservation of 1.6 hectares of this archaeology that is both well-preserved and representative of the sites to be destroyed. The proposed heritage reserve will also have locational and associative relationships with the Waikato River and Nukuhau Pā, along with the local archaeological landscape.

**Dated this 12<sup>th</sup> day of April 2019**



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**Warren Gumbley**