

**BEFORE THE TARANAKI REGIONAL COUNCIL AND NEW PLYMOUTH
DISTRICT COUNCIL**

MT MESSENGER BYPASS PROJECT

In the matter of the Resource Management Act 1991

and

In the matter of applications for resource consents, and a notice of requirement by the NZ Transport Agency for an alteration to the State Highway 3 designation in the New Plymouth District Plan, to carry out the Mt Messenger Bypass Project

**STATEMENT OF EVIDENCE OF RODNEY EDWARD CLOUGH (HISTORIC
HERITAGE) ON BEHALF OF THE NZ TRANSPORT AGENCY**

25 May 2018

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QUALIFICATIONS AND EXPERIENCE

1. My name is Rodney Edward Clough.
2. I am a consulting archaeologist and director of Clough & Associates Limited.
3. I have the following qualifications, professional affiliations and experience:
 - (a) I hold a Doctorate in Archaeology from the University of London and a Master of Arts in Anthropology from the University of Auckland;
 - (b) I am a member of the New Zealand Archaeological Association, and served on its Council for several years, including as President (2009-2011);
 - (c) I am a member of Heritage New Zealand Pouhere Taonga ("**Heritage NZ**") and the International Committee on Monuments and Sites);
 - (d) I have 40 years of experience in the field of archaeology including research, survey, investigation, analysis and report preparation, covering a variety of time periods and geographic locations, and over the last 20 years have largely focussed on New Zealand archaeology;
 - (e) I lectured in archaeology at the University of Auckland for several years prior to establishing my consultancy (1987-1994), and have continued to carry out joint research projects with the University; and
 - (f) My practice carries out a range of work relating to cultural heritage management, in particular archaeological assessments relating to the Resource Management Act 1991 ("**RMA**") and Heritage New Zealand Pouhere Taonga Act 2014 ("**HNZPTA**") requirements, conservation and management plans, survey and inventory, and mitigation investigations. This work has included numerous surveys and heritage assessments throughout the North and South Islands.
4. My team and I have been the lead archaeologists on a number of large infrastructure projects of a similar nature throughout the country including the Wellington Inner City Bypass project, the Auckland Waterview Connection project and the Puhoi to Warkworth Road of National Significance project, and the initial investigations into the highway to replace the Manawatu Gorge.
5. I confirm that I have read the 'Code of Conduct' for expert witnesses contained in the Environment Court Practice Note 2014. My evidence has been prepared in compliance with that Code. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

EXECUTIVE SUMMARY

6. Based on the surveys and assessments completed for the proposed Mt Messenger Bypass Project ("**Project**") there should be no major constraints on the proposal on archaeological or other historic heritage grounds.
7. Recent field work has identified the remains of part of a historic pack track on the saddle ridgeline above the Mangapepeke and Mimi Valleys, and a section of an earlier Mt Messenger Road alignment at one corner of State Highway 3 ("**SH3**") within the Project footprint. These potential archaeological sites are of limited to moderate archaeological value and historic heritage significance. They would ideally be avoided by the proposed construction of the Project, but if not any effects can be appropriately mitigated through archaeological recording under the provisions of the HNZPTA. Both sites potentially meet the definition of archaeological sites under the HNZPTA, meaning that the safe approach is to assume an Authority from Heritage NZ would be required to modify them.
8. There are no known archaeological sites relating to Māori settlement within the Project footprint, even after the field investigations carried out for the Project. Given the large scale earthworks required for this project and taking the nature of Māori settlement patterns into account there is some potential to encounter settlement remains during Project works. This is a possibility in any area where Māori archaeological sites have been recorded in the general vicinity. However, I consider the potential to encounter such sites to be low, given the steep rugged terrain covering much of the route and the fact that the remainder of the route is within low-lying valley floors prone to flooding - topography that would generally have been unsuitable for Māori settlement. In my opinion any archaeological remains that might be present are unlikely to be extensive or significant.
9. The possibility of unrecorded archaeological sites can be provided for under the New Zealand Transport Agency's ("**Transport Agency**") Accidental Discovery Protocols P45 (modified as appropriate in consultation with Ngāti Tama), which will ensure that the appropriate actions are taken and the relevant organisations informed in the event that archaeological sites are encountered. However, as recommended in my assessment the Transport Agency is in the process of applying for an archaeological Authority under the HNZPTA to cover all works undertaken for the Project as a precautionary measure and to avoid delays should unidentified subsurface features be exposed during construction.
10. Taking all of the above into account, I consider the potential adverse effects of Project construction on archaeological sites/historic heritage to be minor. The relevant proposed designation conditions, and the implementation of Accidental Discovery Protocols and / or an archaeological Authority (which will

include an approved Archaeological Management Plan) will ensure that any adverse effects are appropriately managed and mitigated.

11. The Project bypass around Mt Messenger will provide a new, modern alternative to the existing road over Mt Messenger from the state highway network. This will avoid further widening of the existing road and the potential removal of (or any direct effects on) the Mt Messenger tunnel, which is preferable from a heritage perspective. However, the bypass will make this section of SH3 redundant and could reduce the heritage values of the existing tunnel in the long term if options for adaptive reuse are not considered as part of the State Highway revocation process.

BACKGROUND AND ROLE

12. The Transport Agency engaged me to advise it on the Project to improve the section of SH3 between Ahititi and Uruti, to the north of New Plymouth.
13. Along with my colleague Kim Tatton,¹ I prepared the Historic Heritage Assessment included as Technical Report 9, Volume 3 to the Assessment of Environmental Effects ("**AEE**") for the Project.²
14. I prepared an evaluation of heritage/archaeological values for the multi-criteria analysis of shortlisted options for the Project in mid-2017 ("**Shortlist Options Report**").³ Subsequently, a field survey of the preferred realignment option was carried out by Clough & Associates on 7-8 August 2017 and 14-6 March 2018. I have visited the southern part of the route and have carried out a detailed review of aerial photographs of the Project area, but the bulk of the field survey was carried out by Kim Tatton and Ben Jones⁴ of Clough & Associates.

SCOPE OF EVIDENCE

15. The purpose of my evidence is to discuss the potential effects of the Project on historic heritage (archaeology and other historic heritage values), as well as the measures being adopted to address potential effects.
16. My evidence addresses:
 - (a) general historical background of the Project area;
 - (b) archaeological background and the 2016-17 options assessment process;

¹ Kim Tatton has a Master's degree in Archaeology and has worked with Clough & Associates Ltd for the last 18 years as a field archaeologist, researcher and project manager. Prior to that she held positions as the Historic Places Trust Regional Archaeologist, Auckland/Northland, as a consultant to and archaeologist in the Auckland Regional Council Cultural Heritage Team, and as the Department of Conservation Bay of Plenty Conservancy Archaeologist.

² Clough & Associates, October 2017. Mt Messenger Historic Heritage Assessment.

³ R. Clough, July 2017, Mt Messenger: MCA2 Shortlist Historic Heritage Evaluation.

⁴ Ben Jones has a Master's degree in Archaeology and has worked with Clough & Associates Ltd since 2016 as a field archaeologist and GIS specialist.

- (c) the results of the field surveys carried out in 2017 and 2018 by Clough and Associates;
 - (d) an assessment of the archaeological and other historic heritage values of the Project area;
 - (e) an assessment of the effects of the Project on archaeological and other historic heritage values; and
 - (f) proposed management and mitigation of effects;
17. My evidence does not include an assessment of effects on Māori cultural values.

HISTORICAL BACKGROUND

18. Below is a brief summary of the historical background of the Project area and the wider North Taranaki region. It is provided to give relevance and context to the Project area. Sources for this information can be found in Technical Report 9 (which includes some additional detail), unless otherwise stated.
19. The historical associations of Ngāti Tama and other iwi with the project area is discussed in the evidence of Mr Rolleston and I have therefore not included it here.
20. The archaeological evidence indicates that the first settlers in Taranaki and the ancestors of the Māori people arrived in Taranaki during the 13th and 14th centuries. The area offered a wealth of both marine and land resources. The coastal plains of Taranaki were particularly suitable for habitation and the majority of Maori settlement was focused along the coast. This was in contrast to the inland areas of Taranaki which were thickly forested and difficult to navigate.
21. From the 15th and 16th centuries Māori settlement did expand inland to some extent as populations increased and it became necessary to clear more and more land for horticulture. By the time of first European contact in the late 18th century the Māori population in Taranaki was around 10-12,000 people, divided among the several iwi of the region, most of whom were settled along a deforested coastal strip that extended 1-6kms inland.
22. Māori trails through the Taranaki region were foot-tracks along the beaches and coastal flats, and into the inland forests using canoe navigable rivers and valleys. Few rivers in the region were navigable. In north Taranaki the Tongaporutu River was navigable - it leads into the Mangaongaonga Steam valley east of the Project area and links up with the Tihi-Manuka Māori track from the coast inland.
23. During the early 19th century, Northland and Waikato war parties armed with muskets embarked on some 20 years of devastating raids into Taranaki,

during which many Taranaki people moved south to avoid the conflict and settled on the Kāpiti coast and at Te Whanganui-a-Tara (Wellington), where their descendants lived.

24. By the mid-1830s, when a few European traders arrived around the coasts, much of Taranaki had only a few inhabitants and Ngāti Tama's strength in north Taranaki was diminished.
25. From the late 1840s pressure increased to accommodate settlers in the region, with many Māori opposing land sales. As displaced iwi returned to their tribal lands from the south, relations between Māori and Europeans further deteriorated. The first Taranaki war began on 17 March 1860. For the next 10 years both Māori and European society was fractured by wars that saw thousands of British troops garrisoned in the region ("**the New Zealand Wars**").
26. The New Zealand Settlements Act 1863 ("**1863 Act**") enabled the confiscation of land from Māori 'rebels', which was made available to Pākehā settlers. Immediately north of the Project area is the northern extent of the confiscation line created by the 1863 Act, which resulted in the taking of some 74,000 acres of Ngāti Tama land by the Crown south of this line. This, as noted in Geometria 2017,⁵ would have had a significant effect on settlement patterns in the region.
27. The hilly and densely forested terrain of north Taranaki was extremely difficult to navigate, and this was a significant barrier for European settlers. The constant use of Māori tracks during the New Zealand Wars had consolidated them into well-worn footpaths, providing some guidance; but efficient travel demanded wheeled transport and roads. For several decades, the only main road out of Taranaki north was along the coast via Pukearuhe and the White Cliffs, but this road was poorly maintained.
28. The route over Mt Messenger was marked out as early as 1883, with the road driven over the Mt Messenger range in 1896 and completed by 1898. The establishment of the road over Mt Messenger and further north through the Awakino Gorge opened a crucial gateway to the north and was critical to the development of the Taranaki Province. Coastal shipping along the North Taranaki coast was particularly dangerous and the newly formed road immediately served as a valuable piece of pre-1900 infrastructure.
29. The road alignment over Mt Messenger has been little altered over the course of 120 years. Despite the poor condition of the Main North Road, and particularly the section over Mt Messenger, the route was popular with tourists because of its views. Metalling of the road over Mt Messenger began in 1909,⁶ initially with burnt papa (mudstone), burnt in roadside kilns to harden it

⁵ Geometria Ltd. 2017. Archaeological Review. Mt Messenger Bypass. Historic Assessment. Prepared for New Plymouth District Council.

⁶ Opus International Consultants Ltd 2016, Mount Messenger Tunnel SH3, New Plymouth District, p.21.

and then dug away from the road banks. As early as 1916, a tunnel was constructed through a section of the Mt Messenger Road near the summit.⁷ The road was fully metalled in 1923 and sealed in 1926.⁸ In 1935, the Main Highways Board designated the route a state highway.

ARCHAEOLOGICAL BACKGROUND AND 2016-17 OPTIONS ASSESSMENT PROCESS

30. A desk-top archaeological assessment was carried out by Opus in 2016⁹ ("**Opus Report**") as part of earlier work on the Project, and I completed the Shortlist Options Report (a further desk-top archaeological assessment of the shortlisted options) in mid-2017.¹⁰
31. This work identified recorded archaeological sites in the general vicinity of the Project footprint. More than 20 recorded archaeological sites are located within a 7km radius of the Project footprint, all but one site located to the west, on or close to the coast. The choice of the Project route following the options assessment process has avoided all of these sites, and any effects on them.
32. No known archaeological or other historic heritage sites were identified within the Project alignment route. The closest recorded site was Q18/74 Maukuku Pa and related cultivation areas on a relatively flat spur overlooking the Mimi River valley, c. 500m away near the southern end of the Project alignment. Their locations in relation to the route are shown in Figure 12 of Technical Report 9.
33. The northern end of the alignment is in the Mangapepeke Valley. The wider Mangaongaonga Valley further to the east leads into the Tongaporutu Valley and at the lower reaches of that valley where the river meets the coast (about 7km north of the Project area) there are numerous sites relating to earlier Māori occupation. Tihi-Manuka Māori trail, south of Ahititi and east of Mt Messenger, leads into the Tongaporutu Valley.
34. I concluded in the Shortlist Options Report that although no known sites were affected, the presence of archaeological sites in the wider area combined with the nature of Māori settlement patterns - a broad territory or rohe, usually coastal in orientation but with access to numerous inland resources (mara) - indicated some potential to encounter settlement remains.
35. The Opus Report noted several early European farms in the Mangaongaonga Valley to the east of the Project alignment that date to c.1902. From an archaeological perspective, I concluded in the Shortlist Report that the risks of encountering archaeology relating to pre-1900 farming along the Project route

⁷ Ibid, p.24.

⁸ Ibid, p.25.

⁹ Opus International Consultants Ltd, 13 April 2016. Mt Messenger Archaeological Constraints Mapping, by S. Bowron-Muth.

¹⁰ R. Clough, July 2017, Mt Messenger: MCA2 Shortlist Historic Heritage Evaluation.

in the Mangapepeke Valley did not appear to be significantly higher than elsewhere.

RESULTS OF 2017-2018 FIELD SURVEYS

36. Field survey of the Project alignment was carried out by Clough & Associates archaeologists on 7-8 August 2017 and 14-16 March 2018. The latter field survey included private land in the Mangapepeke Valley at the northern end of the Project alignment and the proposed southern fill site in the Mimi River Valley, which had not previously been surveyed. The surveys followed a detailed examination of aerial photography and early plans, and a review of historical information relevant to the area.
37. Archaeological survey techniques based on visual inspection cannot necessarily identify all subsurface archaeological features, or detect wāhi tapu and other sites of traditional significance to Māori, especially where these have no physical remains. In addition, survey conditions within the Mangapepeke Valley and upper Mimi Valley were extremely difficult due to the steep bush-covered terrain, in terms of access and ground visibility.
38. The steep inland bush country around Mount Messenger would generally have been unsuitable for intensive Māori occupation and use, which was focused along the coastal plains and near navigable rivers, but would have provided a source of raw materials accessed by tracks and trails. There is unlikely to have been any significant occupation of the Mangapepeke Valley because of its frequent flooding and steep inaccessible valley sides, although the valley may have been used by Māori to access inland areas.

Māori archaeological sites

39. The southern end of the Project alignment is located within the Mimi River valley, in proximity to the recorded archaeological site Q18/74, Maukuku Pa (noted above), and related cultivations on a relatively flat spur overlooking the Mimi River valley. An 'old clearing' ('Ngā oko oko') was also identified from early survey plans (SO 864 and SO 25-13A) adjacent to Maukuku Pa, indicative of the type of location that favoured Māori settlement in these inland locations. This is in contrast, however, to the spurs on the western side of the Mimi River valley below SH3 and within the Project footprint that are generally steep sided and very narrow, particularly in the north of the valley towards its headwaters.
40. No Māori archaeological sites have been identified within the Project footprint, either through historical information, previous investigations or the field survey. However, as already noted, I consider that there is some, albeit limited, potential to encounter unidentified settlement remains at the southern end of the Project footprint, although these are unlikely to be extensive or significant.

Historic pack track and sections of earlier Mt Messenger Road

41. The remnants of a historic 'pack track' identified in survey plan SO 982 (1897) were located during field survey in 2018. This consists of a narrow, unsealed track approximately 250-300m long from the rest area at the summit of the Mt Messenger Road east along the saddle ridgeline between the Mangapepeke and Mimi Valleys. It is located on private land to the south and above the driveway accessed off the rest area that was formed in the 1930s, and there could be further evidence of the pack track outside the Project footprint. Two small sections of an earlier Mt Messenger Road alignment were identified during the field survey on corners of SH3 that could possibly relate to the period when the road was first formed as a pack track in 1894-96, prior to when the road was widened for wheeled traffic from 1900. These consist of short sections of narrow, unsealed road benching around the edge of spurs that have subsequently been cut through by road alignment alteration and the Mt Messenger tunnel. One of these sections is located on the corner of SH3 and the edge of the Project footprint above the Mimi Valley.
42. No evidence was found along the SH3 Mt Messenger Road alignment of the roadside papa kilns that were dug away from the road banks for road metal from 1909. Continuous road maintenance, widening and alteration over the Mt Messenger section of SH3 throughout the 20th century is likely to have removed any evidence of these kilns in the roadside banks within the Project footprint, although it is possible that evidence of papa kilns may survive elsewhere near the earlier road alignment.

Maps of relevant sites

43. **Figure 1** and **Figure 2** in **Appendix 1** below show the location of the historic pack track, and the earlier Mt Messenger alignment mentioned above, in relation to the Project footprint.

ASSESSMENT OF ARCHAEOLOGICAL AND HISTORIC HERITAGE VALUES

Pack track and earlier sections of Mt Messenger Road

44. The only archaeological or other historic heritage elements identified within the footprint of the Project route as a result of the 2017 and 2018 field surveys and previous assessments are the pack track and the earlier sections of the Mt Messenger Road alignment, as shown on **Figure 1** in **Appendix 1**.
45. The 19th century pack track and the earlier sections of the Mt Messenger Road alignment were identified in the 2018 survey subsequent to the preparation of Technical Report 9, and have potential archaeological and other historic heritage values. In terms of the heritage criteria in the New Plymouth District Plan,¹¹ I consider that the pack trail and earlier road alignment have moderate contextual, historical and technological significance

¹¹ NPDP Appendix 8, Section 8.1.

associated with early inland routes through the hilly and densely forested terrain of north Taranaki, and the recognised significance of the road over Mt Messenger, but limited significance under the other criteria.

46. It is arguable whether the pack track and earlier sections of the Mt Messenger Road alignment fit within the definition of an archaeological site under the HNZPTA. Under that Act, an archaeological site must date to before 1900, and also be capable of providing evidence relating to the history of New Zealand through investigation by archaeological methods.¹²
47. As the track and road alignments are unsealed and have no identifiable fabric, the recoverable evidence is likely to be limited. However, such evidence could include determining their footprint and any cuts or fill required to form them. Taking a conservative approach, I have presumed these sites do qualify as archaeological sites under the HNZPTA.
48. Heritage NZ provides guidelines setting out criteria that are specific to archaeological sites (condition, rarity, contextual value, information potential, amenity value and cultural associations).¹³ Under these criteria I would consider the track and road alignments to have limited information potential, and to be of limited value in terms of condition, rarity, amenity value and cultural associations. However, their contextual values are moderate in terms of early travel and transport networks in the area.

Possible sites related to Māori occupation

49. In addition to these identified heritage elements, there is also some, though limited, potential for unidentified archaeological sites relating to Māori occupation to be present. As discussed above, no such sites have been identified to date.

The Mt Messenger tunnel

50. Another heritage feature in the vicinity, although not within the Project footprint, is the Mt Messenger Road tunnel on the existing SH3. The tunnel is not a scheduled heritage site in the New Plymouth District Plan or on the New Zealand Heritage List.
51. However, the tunnel's historic heritage significance has been assessed by Opus as part of the SH3 Mt Messenger realignment project.¹⁴ Using the criteria for assessing historic heritage in the New Plymouth District Plan and Transport Agency guidelines, it was assessed as having moderate to high heritage significance, based on its high contextual, historic and social value, moderate cultural and aesthetic value, and potential archaeological value.

¹² Section 6 Heritage New Zealand Pouhere Taonga Act 2014.

¹³ Heritage NZ. 2006. Writing Archaeological Assessments. Archaeological Guidelines Series No. 2. New Zealand Historic Places Trust Pouhere Taonga (now Heritage NZ).

¹⁴ Opus International Consultants Ltd 2016, Mount Messenger Tunnel SH3, New Plymouth District.

Many of these values are intrinsically connected with the significance of the road over Mt Messenger, forming part of SH3. I agree with this assessment.

ASSESSMENT OF EFFECTS ON ARCHAEOLOGICAL AND HISTORIC HERITAGE VALUES

52. The Project has the potential to affect the historic pack track on the saddle ridgeline above the Mangapepeke and Mimi Valleys, and the sections of an earlier Mt Messenger Road alignment on the corner of SH3, as shown in **Figure 1**. These potential archaeological sites should ideally be avoided by the construction of the Project.
53. If these potential archaeological sites cannot practically be avoided any effects can be appropriately mitigated through detailed archaeological recording under the provisions of the HNZPTA. The affected sites are of limited to moderate archaeological value, and therefore any (pre-mitigation) effects are likely to be minor.
54. No Māori archaeological sites were identified within the Project construction corridor, either through historical information, previous investigations or the field surveys. However, in any area where archaeological sites have been recorded in the general vicinity it is possible that unrecorded subsurface remains may be exposed during development. I consider this to be a low possibility, given the steep rugged terrain covering much of the route and the fact that the remainder of the route is within low-lying valley floors prone to flooding. However, given the large scale earthworks required for this project and taking the nature of Māori settlement patterns into account there is some potential to encounter settlement remains within the Project footprint, although these are unlikely to be extensive or significant.
55. The Project will remove the existing road over Mt Messenger from the state highway network. This will avoid further widening of the existing road and the potential removal of the Mt Messenger tunnel, which is preferable from a heritage perspective. The Project will have no direct impact on the existing Mt Messenger tunnel.
56. However, the Project will make the bypassed section of SH3 redundant and therefore ultimately reduce the heritage values of the existing tunnel if options for adaptive reuse (such as a walking or cycle route, continued use of the bypassed section of SH3 as a local road, or continued use for private or commercial vehicle access) are not considered. This is a matter for the state highway revocation process, which I understand is being pursued separately by the Transport Agency (in consultation with New Plymouth District Council).¹⁵

¹⁵ See the evidence of Mr Napier on the revocation process.

PROPOSED MANAGEMENT AND MITIGATION OF EFFECTS

57. Designation conditions are proposed to address the accidental discovery of archaeological sites and kōiwi tangata. The possibility of discovering archaeological remains can be provided for by putting procedures in place ensuring that the New Plymouth District Council and Heritage NZ are contacted should this occur, in accordance with the Transport Agency's Accidental Archaeological Discovery Specification (P45). I understand P45 may be modified for the Project following consultation with Ngāti Tama, which I consider to be appropriate.
58. However, to avoid any delays should unidentified subsurface features be exposed by the proposed works, as recommended in Technical Report 9 the Transport Agency is in the process of making an application for an archaeological Authority under section 44(a) of the HNZPTA to cover all works undertaken for the Project. The Authority will, as is standard practice, include a management plan approved by HNZPTA.
59. Once an authority is in place, P45 would no longer apply as the authority conditions would set out the procedures relating to archaeological discoveries. This is noted in proposed condition 30 (as lodged). Ngāti Tama would be consulted in respect of any archaeological Authority under the HNZPTA.
60. The historic pack track on the saddle ridgeline above the Mangapepeke and Mimi Valleys and the sections of an earlier Mt Messenger Road alignment at one corner of SH3 within the Project construction corridor should ideally be avoided during construction. Detailed plans of auxiliary developments, such as the development of access roads, heavy machinery storage areas, infrastructure installation and vegetation removal should note the location of these features and ensure that they are avoided and not impacted on. These sites should be temporarily marked out or fenced off prior to the start of earthworks to protect them from accidental damage from heavy machinery.
61. If these sites cannot practically be avoided an Authority must be applied for under section 44(a) of the HNZPTA and granted by Heritage NZ prior to the start of any works that will affect them. This would generally include a requirement that the sites are recorded in detail by an archaeologist prior to and during any construction works that may affect them. This will be addressed by the overarching Authority for all works associated with the Project that is discussed above.

RESPONSE TO SECTION 42A REPORT

62. The house and other various farm buildings on the Pascoe property at the northern end of the Mangapepeke Valley are located within the Project construction corridor and will be removed. The earliest we can identify a house in this location is on the 1943-45 aerial photographs. However, earlier survey plans do not show this house or any other structures at this location.

63. There is no indication from a brief external examination of the house that it has any heritage values or that it dates much earlier than the 1940s. Prior to demolition the house and other farm buildings will be inspected and any earlier 20th century features will be recorded.

CONCLUSION

64. Based on the surveys and assessments undertaken for the Project, there should be no major constraints on the proposed construction of the Project on archaeological or other historic heritage grounds. The potentially affected heritage elements (the pre-1900 pack track and earlier section of Mt Messenger Road) are of no more than moderate archaeological and other historic heritage value.
65. They should ideally be avoided but, if impacts cannot practically be avoided, the adverse effects would be minor and can be appropriately mitigated through archaeological recording under the provisions of the HNZPTA (and, if relevant, in accordance with the conditions of the archaeological Authority to be obtained for the Project).
66. The potential for the discovery of unidentified archaeological sites is limited and can be managed through appropriate accidental discovery protocols and/or an archaeological Authority under the HNZPTA, as provided for in the proposed conditions.

Rod Clough

25 May 2018

APPENDIX 1

(Overleaf)

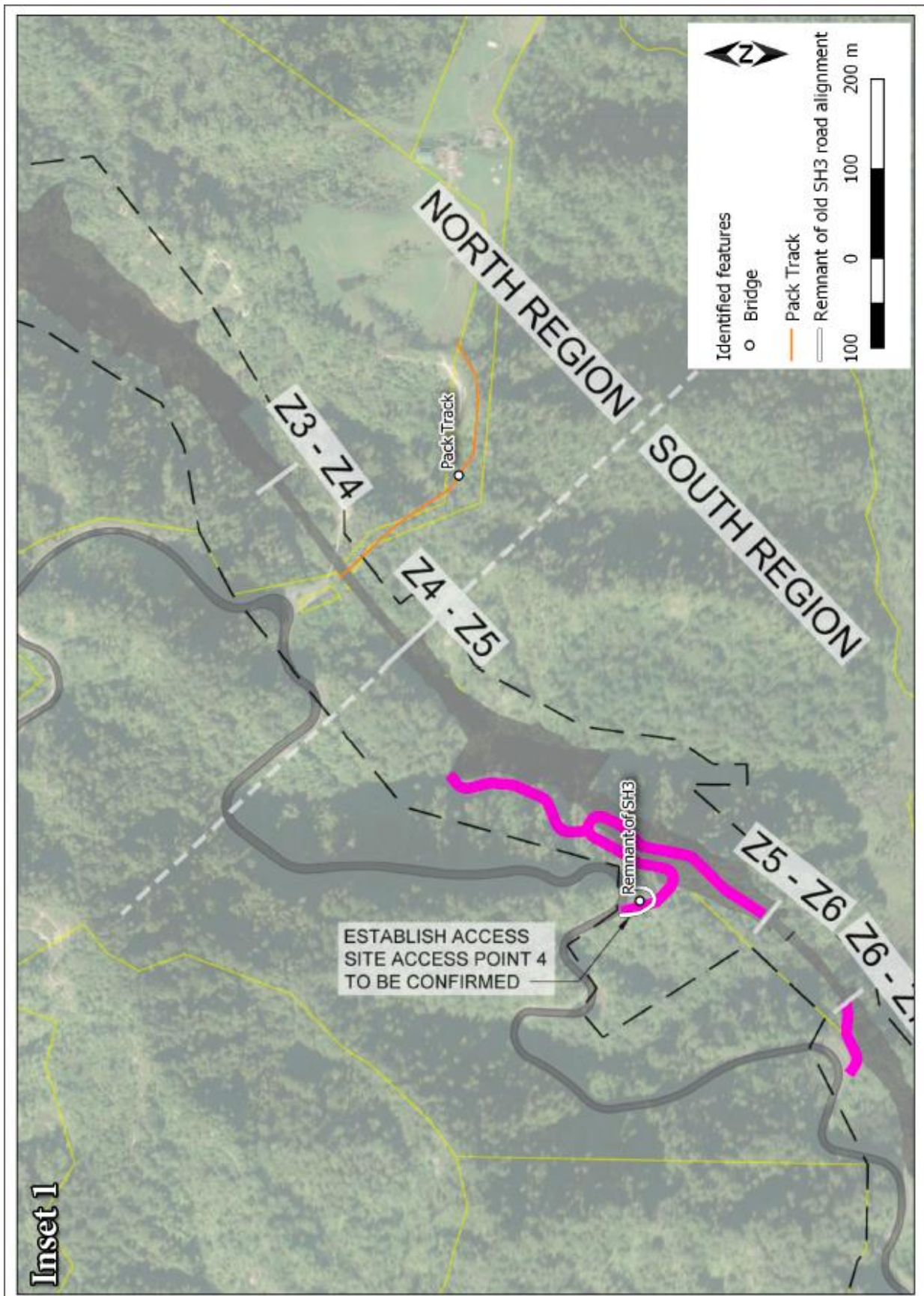


Figure 2. Detail showing location of pack track and SH3 remnant at southern end of the Project area