

***SPECIALIST INPUT FOR HERITAGE PART 7 OF
AUCKLAND CITY DISTRICT PLAN: HAURAKI
GULF ISLANDS SECTION – PROPOSED 2006***

Report prepared for Auckland City Council

By

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RESPONSE TO SUBMISSIONS

Issue Raised Unless the value, number and dimensions of the identified archaeological sites, geological sites and sites of ecological significance on Thumb Point Station Ltd's land (CT 47C/889) can be supported by relevant and satisfactory assessment, they should be deleted or amended.

Submission Numbers 526/13

Issue Raised Unless the value, number and dimensions of the identified archaeological sites, geological sites and sites of ecological significance on Man O' War Farm Ltd's land (CTs 82C/468, 741/131, 637/197) can be supported by relevant and satisfactory assessment, they should be deleted or amended.

Submission Numbers 527/13

Issue Raised Unless the value, number and dimensions of the identified archaeological sites, geological sites and sites of ecological significance on Huruhe Station Ltd's land (CTs 758/233, 26A/1074, 26A/1073, 758/234, 758/235, 26A/1075) can be supported by relevant and satisfactory assessment, they should be deleted or amended.

Submission Numbers 528/13

Issue Raised Unless the value, number and dimensions of the identified archaeological sites, geological sites and sites of ecological significance on Man O' War Station Ltd's land (CTs 195/118, 173/117) can be supported by relevant and satisfactory assessment, they should be deleted or amended.

Submission Numbers 529/13

Issue Raised Unless the value, number and dimensions of the identified archaeological sites, geological sites and sites of ecological significance on South Coast Station Ltd's land (CTs 23C/200, 23/199) can be supported by relevant and satisfactory assessment, they should be deleted or amended.

Submission Numbers 539/13

Comments

(Submissions 526/13, 527/13, 528/13, 529/13, 539/13)

Under section 187 of the Resource Management Act, as a heritage protection authority, the Auckland City Council is required to recognise and provide for the heritage resources of the Auckland region and Hauraki Gulf Islands. In meeting this obligation to protect heritage resources, the ACC's Proposed District Plan has sought to "identify and evaluate heritage values, manage the effects of land use on heritage and to encourage protection of these values through appropriate techniques" (ACC Proposed District Plan – Hauraki Gulf Islands Section: 1). To achieve this, the ACC's District Plan has assessed the known archaeological resources on several of the Inner Gulf Islands, including Waiheke Island, and has identified a number of archaeological sites as having significant scientific and cultural heritage value to warrant "regulatory protection through scheduling" (ACC Proposed District Plan – Hauraki Gulf Islands Section: pg 1-5). This assessment process included systematic survey to identify, locate and determine the extent or site area of known archaeological sites. Sites were then assessed for their archaeological significance based on an evaluation process using a wide number of recognised criteria. Category A and Category B sites were identified – Category A sites "are to be protected in perpetuity", while Category B sites are still protected from "inappropriate use and development, having regard to the effect of a proposal on the heritage values of the said scheduled item, and the applicant's objectives and reasons for the proposed use or development". Therefore, we consider that this submission has been satisfied.

Issue Raised**DP Map Ref: 7-5**

Amend the archaeological area 7-5 to the existing two areas as noted on the title to Lots 10 and 11. It should not be extended onto any part of lot 12 (60 Cable Bay Lane).

**Submission
Numbers
Comments**

1247/1

This property is part of the Park Point subdivision. An archaeological assessment by Clough & Associates (1996) was undertaken as part of the subdivision process. Archaeological site 7-5 (R11/1868) was identified during this assessment and its boundaries were surveyed onto the subdivision plan. A consent notice was then attached to the relevant subdivision title (DP 331964) identifying the extent of this site. The proposed district plan GPS site boundaries for 7-5 (R11/1868) are more extensive than the consent notice as determined by the 1996 archaeological assessment, and cover part of an access way to 58 and 60 Cable Bay Lane.

Recommend that the site surround of archaeological site 7-5 (R11/1868) be amended to match the surveyed boundaries as identified by Clough & Associates (1996) and shown on DP 331964 as protected areas 'BC' and 'BD'.

Issue Raised **DP Map Ref: 7-5**
That the boundaries to the heritage site 7-5 as identified in the Plan be realigned to accord with the surveyed boundaries as identified by Clough and Associates and shown on Deposited Plan 331964 as protected areas "BC" and "BD" (Plan attached to submission)

Submission Numbers 2100/1

Comments This property is part of the Park Point subdivision. An archaeological assessment by Clough & Associates (1996) was undertaken as part of the subdivision process. Archaeological site 7-5 (R11/1868) was identified during this assessment and its boundaries were surveyed onto the subdivision plan. A consent notice was then attached to the relevant subdivision title (DP 331964) identifying the extent of this site. The proposed district plan GPS site boundaries for 7-5 (R11/1868) are more extensive than the consent notice as determined by the 1996 archaeological assessment, and cover part of an access way to 58 and 60 Cable Bay Lane.

Recommend that the site surround of archaeological site 7-5 (R11/1868) be amended to match the surveyed boundaries as identified by Clough & Associates (1996) and shown on DP 331964 as protected areas 'BC' and 'BD'.

Issue Raised **DP Map Ref: 7-7**
That council remove archaeological site 7-7 in its entirety.

Submission Numbers 2099/1

Comments Agree. A review of the site evaluation indicates that scheduling is not warranted. The score does not appear to be supported and in particular the score of '24' under History – L (K?). Early Period. "Site dates from an early period of European settlement". In addition the concrete foundations and drains have subsequently been removed.

Issue Raised **DP Map Ref: 7-9**
Remove the portion of archaeological site surrounds 7-9 which encompasses the building platform of Lot 35 of the Park Point subdivision and its immediate surrounds (Plan attached to submission).

Submission Numbers 2099/2

Comments This relates to site 7-7 (see above). If site 7-7 is removed from the schedule as a result of reassessment of its significance (see comments to Submission Numbers 2099/1 above), then the site surround 7-9 could correspondingly be reduced.

Issue Raised	DP Map Ref: 9-3 That the boundaries of the grave sites (map ref 9-3) referenced as GPS points (NZMG) shown in Appendix 1a of the Plan be amended so they are consistent with the boundaries of the applicable easement plan (included as Appendix 2 of this submission).
Submission Numbers	1271/1
Comments	The provided easement plan includes the actual ‘easement’ to the site from the foreshore, which is not relevant to the site area of the cemetery. Make sure the easement plan includes the site area of the cemetery. This is not clear from Appendix 2 provided with the submission.
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Issue Raised	That the site (map ref 9-3) be recorded as a “Private Cemetery” under the “Description of items”, not Cemetery.
Submission Numbers	1271/2
Comments	Cemetery is a generic term to describe the site or feature type for the purposes of classification only. Could possibly amend the map 9-3 to read “Cemetery (Private)”.
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Issue Raised	Corrections to the Archaeological site information (for map ref 9-3) as follows (but not limited to) – The site was upgraded from its original state by the Kennedy Family in 1998 with the concrete grave covers being replaced with a single concrete slab and the original headstones remounted on the new slab. At this time the original stainless steel railings on all three headstones were also replaced. The reference to the site being accessible via 26 Donald Bruce Road is not correct as access is only available from 32 Donald Bruce Road or via the easement shown.
Submission Numbers	1271/3
Comments	Agree. Include the following information as requested – “The site was upgraded from its original state by the Kennedy Family in 1998 with the concrete grave covers being replaced with a single concrete slab and the original headstones remounted on the new slab. At this time the original stainless steel railings on all three headstones were also replaced”. Include the following information – “Access to the cemetery is from 32 Donald Bruce Road or via a foreshore easement”. Remove the following information from the site pack for 9-3 – “Accessible via 26 Donald Bruce Road”.
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Issue Raised **DP Map Ref: 9-5**
That the heritage designation (archaeological site, map ref 9-5) be deleted in its entirety.

Submission Numbers 1270/1

Comments Do not agree. This is the location of Captain John Brown Kennedy’s house (1888) – ‘Dunesslin’. It includes 3 norfolk pines, a bougainvillea and a concrete water tank (1889). It is also the unconfirmed location of a shipyard. This is a significant archaeological site/historic place in its own right, even without the unconfirmed location of the shipyard. (Further research including Historical Land Deeds Index 18A 528 can be carried out to confirm whether or not this was also the site of a shipyard.)

Issue Raised **DP Map Ref: 9-6**
That the boundaries of the Kennedy Bay oyster farm (map ref 9-6) as shown in Appendix 1a of the Plan be amended so that the most westward boundary of the heritage designation is located below the line of MHWS and does not extend to the property at 38 Donald Bruce Road, Waiheke.

Submission Numbers 1268/1

Comments Agree. Amend landward boundary to MHWS to reflect the accurate boundary of this site.

Issue Raised That the following corrections (but not limited to) to the archaeological site information for Kennedy Bay oyster farm (map ref 9-6) be made:

1. The vagueness and spelling mistakes of the second half of the description be removed.
2. The poor condition of the site be recognised.
3. Recognition of the labour of the prisoner of war camp at Motuihe.

Submission Numbers 1268/2

Comments

1. Agree. There is some repetition in the Archaeological Site Information form under ‘Description’. Amend the form to read – “Angular basalt rocks arranged in 30-40m lines, 2m apart and 10-15m long along the foreshore below MHWS. Oysters grow on the rocks. Towards the point individual rocks have been placed about 1m apart. The Marine Department started to establish oyster farms using rock formations in the 1880s but this site probably dates from the 1920s.” Confirm or amend location stated on NZAA site record form 1993 - This site is located in Putiki Bay or Kennedy Bay, near the southern end of Kennedy Point.
2. Do not agree. The Archaeological Site Information forms states that the site is “Intact; ... in excellent condition”.
3. Would need to confirm through further research whether POWs from Motuihe constructed this site.

Issue Raised **DP Map Ref: 9-10**
Objects (with particular reference to a heritage item at 4 Blake Street, Surfdale) in the strongest possible terms to the proposed zoning. That if there is a heritage item on the land it be specifically identified.

Submission Numbers 53/1

Issue Raised **DP Map Ref: 9-10**
Opposes the area (subject to map ref 9-10) becoming a heritage item, leave the properties as they are if you must protect something, then how about just the beach area - as far only as the sand goes.

Submission Numbers 3395/1

Issue Raised **DP Map Ref: 9-10**
Re-define the boundaries of map ref 9-10 (S11/0013 in appendix 1a) to exclude properties 20 and 20a Hamilton Rd, Surfdale, from the category B heritage item listing.

Submission Numbers 786/1

Issue Raised **DP Map Ref: 9-10**
That the category B heritage item listing be removed from properties 20 and 20a Hamilton Rd, Surfdale.

Submission Numbers 786/2

Issue Raised **DP Map Ref: 9-10**
That the archaeological area planned to be scheduled (map ref 9-10) needs to be reconsidered.

Submission Numbers 793/1

Issue Raised **DP Map Ref: 9-10**
Delete archaeological reference 9-10 from property at 24 Hamilton Road, Surfdale, Waiheke

Submission Numbers 2577/1

Issue Raised **DP Map Ref: 9-10**
That the heritage designation archaeological site (map ref 9-10) be removed from the site at 43 Lannan Road, Surfdale.

Submission Numbers 483/1

Issue Raised **DP Map Ref: 9-10**
To remove the status of archaeological item (map ref 9-10, at 2 Miami Ave) from the Plan.

Submission Numbers 361/1

Issue Raised **DP Map Ref: 9-10**
Removal of my property (24 Miami Avenue, Surfdale) from the Plan. Object to heritage item based on midden deposits found on Surfdale Beach.

Submission Numbers 57/1

Issue Raised **DP Map Ref: 9-10**
Restrict the zoned area which protects archaeological deposits (map ref 9-10) to exclude Ocean Road, Surfdale or revoke the proposed zoning.

Submission Numbers 37/1

Issue Raised **DP Map Ref: 9-10**
That the property at 3 Ocean Road, Waiheke be excluded from the scheduled archaeological site (map ref 9-10) in its entirety.

Submission Numbers 1092/1

Issue Raised **DP Map Ref: 9-10**
Remove the archaeological site (map ref 9-10) from the property at 92 The Esplanade, Waiheke (Seaside Sanctuary Rest Home)

Submission Numbers 2112/1

Issue Raised **DP Map Ref: 9-10**
That the area at Surfdale currently designated category B (map ref 9-10) be reduced to the area immediately adjacent to the beachfront (the only area identified in the survey carried out by Clough and Assoc. as having shell deposits in the Surfdale Beach area) which is public land, as it is at Matiatia - a site of known historical significance.

Submission Numbers 36/1

Issue Raised **DP Map Ref: 9-10**
To have all specific archaeological protections removed from private properties in Surfdale.

Submission Numbers 36/2

Issue Raised **DP Map Ref: 9-10**
That the archaeological item 9-10 be deleted from the scheme or refined to one or more small areas.

Submission Numbers 291/1

Issue Raised **DP Map Ref: 9-10**
Remove the heritage designation as applied to any part of Surfdale other than foreshore land in council ownership.

Submission Numbers 783/1, 789/1, 3168/1

Issue Raised **DP Map Ref: 9-10**
A decision to remove the status of 'archaeological item' 9-10 from the District Plan.

Submission Numbers 2061/1

Issue Raised **DP Map Ref: 9-10**
Amend the proposed plan to redefine the area mapped as archaeology item S11/0013 (map ref 9-10) to include only the surveyed area on Surfdale Reserve.

Submission Numbers 2062/1

Issue Raised **DP Map Ref: 9-10**
Seeks to have the archaeological site 9-10 removed from the Surfdale area in its entirety.

Submission Numbers 2639/1

Issue Raised **DP Map Ref: 9-10**
Archaeological site 9-10 should be removed in its entirety.

Submission Numbers 2664/1

Issue Raised **DP Map Ref: 9-10**
Re-address the rating valuation if archaeological site 9-10 not changed under the new plan due to adverse affect on the properties values (with specific reference to 90 The Esplanade, 10 Blake Street, 14 Hamilton Road, Surfdale, being lots 109, 114 and 115 DP 16354).

Submission Numbers 2664/2

Issue Raised **DP Map Ref: 9-10**
That this section of the proposed Plan (map ref 9-10) be deleted.

Submission Numbers 3329/1

Issue Raised **DP Map Ref: 9-10**
That this section of the proposed plan (map ref 9-10) be amended to include only public land.

Submission Numbers 3329/2

Issue Raised **DP Map Ref: 9-10**
Opposes archaeological site 9-10.

Submission Numbers 3550/1

Comments (Submissions 786/1, 786/2, 793/1, 2577/1, 483/1, 361/1, 57/1, 37/1, 1092/1, 2112/1, 36/1, 36/2, 291/1, 783/1, 789/1, 3168/1, 2061/1, 2062/1, 2639/1, 2664/1, 2664/2, 3329/1, 3329/2, 3550/1)

Agree. The site area of 9-10 (S11/13) does need to be reassessed. Given the difficulty of accurately determining the extent of this site outside the Surfdale Reserve, the number of private landowners affected by the current site area, and the considerable level of modification to archaeological deposits on private property from residential development, it is recommended that Council consider amending the current site area of site 9-10 to within public land along the Surfdale foreshore.

Issue Raised **DP Map Ref: 10-6**
Delete 21 View Road, Onetangi from the Plan (specifically in regards to archaeological site 10-6).

Submission Numbers 502/1

Comments Reject. From the archaeological site plan part of archaeological site 10-6 (S11/830), a terrace feature, does extend into, or is at least on the boundary, of 21 View Road.

Issue Raised **DP Map Ref: 16-1**
To reduce the Scheduled area 16-1 at 630 Gordons Road (Deadmans Bay/Woodside Bay headland) from approximately 1.8 hectares to 1 hectare. (Plan attached to submission).

Submission Numbers 2644/1

Comments Reject. A site visit on 28/11/06 did amend and reduce the site area of archaeological site 16-1. This new site area was mapped by GPS. However, the plan attached to the submission showing the requested reduction to the site area is inaccurate, too small and does not include all archaeological features associated with site 16-1 and recorded on the 28/11/06.

Issue Raised To note that it would be impractical for the Scheduled Area 16-1 to be fenced off.

Submission Numbers 2644/2

Comments Reject. This headland and the extent of the archaeological site S11/62 could quite practically be fenced off.

Issue Raised To provide the submitters with confirmation, in writing, that they can continue to farm Scheduled Area 16-1 as they have done for many decades.

Submission Numbers 2644/5

Comments Reject. This headland and the extent of site 16-1 (S11/62) could quite practically be fenced off. The resulting loss of grazing land would be negligible in comparison to the total property size and the available grazing area.

Issue Raised **DP Map Ref: 16-3**
To completely remove the item S11/0827 map ref 16-3 as, if this site existed, it has been totally desecrated by the earthworks indicated.

Submission Numbers 35/1

Comments Agree. This site has been destroyed. Inform NZHPT and update NZAA site record form.

Issue Raised **DP Map Ref: 16-5**
Move the boundary of the site surrounds for archaeological site (map ref 16-5) very slightly north to avoid 339 Gordons Road (Lot 3 DP66657).

Submission Numbers 488/1

Comments Reject. Archaeological site surrounds are calculated by a spatial programme that incorporates other archaeological sites, whether scheduled or not, within an expanding distance from category A archaeological sites. This indicates that the area scheduled as an archaeological site surround contains at least one other archaeological site and this raises the possibility that the area may contain other as yet unrecorded archaeology. The approach to this site is consistent with that taken to others.

Issue Raised **DP Map Ref: 17-6**
That additional limitation (map reference 17-6) be resurveyed so that the 5 sites identified in 1995 (plan attached to submission) not be connected in the manner proposed (five sided figure), but rather be identified by individual protection circles.

Submission Numbers 1178/1

Comments Possibly. This recorded archaeological site was surveyed, assessed and reviewed in 2002 as part of the ACC District Plan process. As a result this site was scheduled in the proposed District Plan as category B archaeological sites, which “Although these sites are considered to be less significant than category A sites, it is still important for the features to be protected from inappropriate use and development, having regard to the effect of a proposal on the heritage values of the scheduled item, and the applicant’s objectives and reasons for the proposed use or development. Therefore, the partial loss or modification of category B sites may be acceptable where there is no alternative and everything has been done to avoid, remedy or mitigate any adverse effects”.

I cannot relate the archaeologist’s site plan (does not show position of building or GPS points in relation to archaeological features) to the submitter’s plan of where they believe the five archaeological ‘sites’ (features?) to be. Therefore it is difficult to determine whether the site area is excessive as submitted. The submitter refers to a survey by Brenda Sewell in 1995 that identified these five ‘features’. However, according to the site information pack there are in fact fourteen archaeological terrace features and midden scatter. The submitter’s house and garden are located within the site surround, which according to his submission was consented in 1995 by Council. Given the confusion surrounding this site and the inadequate site plan perhaps this site should be revisited and assessed by archaeologists.

Issue Raised **DP Map Ref: 18-3**
Maunganui (258C Orapiu Road, Lot 3 DP 195441) to be removed from the schedule.

Submission Numbers 3301/1

Comments Do not agree. This site is already scheduled; a very significant site.

Issue Raised **DP Map Ref: 18-5**
That the area marked “Heritage feature” (scheduled archaeological site S11/737, map ref 18-5) becomes more specifically defined.

Submission Numbers 834/1

Comments Agree to a certain extent. Redefine site area as per amended site map 18-5 (attached). Site does not extend into the tidal zone as shown originally.

Issue Raised **DP Map Ref: 19-1**
To reduce the Scheduled Area 19-1 (Awaawaroa headland pa site) at 630 Gordons Road so as to provide a house site and access (up the existing farm track) without having a significant impact on the main archaeological attributes of the site (plan attached to submission).

Submission Numbers 2643/1

Comments Do not agree. The scheduled site area of 19-1 relates to the extent of identified archaeological features, and the area to be protected. This should not be compromised for any future proposed development.

Issue Raised **DP Map Ref: 19-1**
To provide the submitter with confirmation, in writing, that they can continue to farm the Scheduled Area 19-1 as they have done for many decades.

Submission Numbers 2643/4

Comments Do not agree. This headland and the extent of site 19-1 (S11/61) could quite practically be fenced off. The resulting loss of grazing land would be minimal in comparison to the total property size and the available grazing area.

Issue Raised **DP Map Ref: 19-2**
To review the archaeological evaluation for the Awaawaroa Wharf (map ref 19-2) given the further information set out by the submitter and in particular, to reassess the scores given to the Wharf under headings B, D, F, G, H, N, O of Appendix 4 Section 1 of the Plan.

Submission Numbers 2642/1

Comments Agree. Once reviewed, changes if any, will be processed.

Issue Raised If the archaeological reassessment of Awaawaroa Wharf results in a score of less than 50, to remove the Wharf as a Scheduled Heritage Item from the plan before it becomes operative.

Submission Numbers 2642/2

Comments Agree. Once reviewed, changes if any, will be processed.

Issue Raised If the archaeological reassessment of the Awaawaroa Wharf results in a score in excess of 50 reassess the Wharf for removal as a Scheduled Heritage Item prior to the next 10 year District Plan Review (due 2016/2017) given the further deterioration in the remnant structure that is likely to have resulted in the intervening period.

Submission Numbers 2642/3

Comments Reject. All heritage items will be reviewed in the future prior to the next District Plan.

Issue Raised Note that (1) because the Wharf serves no useful purpose; and (2) because of exorbitant ACC and ARC rates levied the Property Owners have no financial wherewithal to undertake any repairs to or maintenance on the remnant structure.

Submission Numbers 2642/4

Comments Agree. Repairs and maintenance are not a District Plan requirement for scheduled heritage items.

Issue Raised **DP Map Ref: 23-21**
In appendix 1a, amend site S11/NEW 3 (map ref 23-21, Cowes Bay Road) to include reference to 'log chute'.

Submission Numbers 3521/149

Comments Agree, in part. Shouldn't the wording included be in fact 'kauri slide'. The recommended purpose to identify what the site is in Appendix 1a, rather than just "S11/NEW3".

Issue Raised **DP Map Ref: 25-8**
To review the HGI.22 for the site (map ref 25-8) given the further information provided and, in particular, to reassess the scores given to the site under headings, A, F, G and H of Appendix 4 Section 1 of the proposed Plan.

Submission Numbers 1274/3

Comments Reject. Site visited and reassessed on 1/4/07 from initial 2002 visit. Scores given to the site under headings, A, F, G and H of Appendix 4 Section 1 of the proposed Plan do not need further reassessing and should remain.

Issue Raised Assuming the HGI.22 once reassessed results in a score of less than 50, to remove the site (map ref 25-8) as a scheduled heritage item from the proposed Plan before it becomes operative.

Submission Numbers 1274/4

Comments Reject. Site visited and reassessed on 1/4/07 from initial 2002 visit. Scores given in the site evaluation in 2007 were 64, i.e. more than 50.

Issue Raised If the reassessment results in a score in excess of 50 points, to reassess the site (map ref 25-8) for removal as a scheduled heritage item prior to the next 10 year District Plan Review (due 2016/2017) given the further deterioration that is likely to result without intervention on the part of Council or the property owners in the interim.

Submission Numbers 1274/5

Comments Reject. Site visited and reassessed on 1/4/07 from initial 2002 visit. Scores given in the site evaluation in 2007 were 64, i.e. more than 50. All heritage items will be reviewed in the future prior to the next District Plan.

Issue Raised For Council staff to reassess the site (map ref 25-8) with a view to removing an area from the scheduled area (plan attached to submission), so as to provide a house site with access (up the existing farm track) without having a significant impact on the main archaeological features of the site. If the site were redefined following reassessment to mark (peg), on the ground, the boundaries of the revised Scheduled Area.

Submission Numbers 1274/7

Comments Site visited and reassessed on 1/4/07 from initial 2002 visit (Plowman and Clough Mar 2007) – “Site 25-8 (S11/74) is a fairly large and comparatively complex settlement site that incorporates a combination of terrace, pit, tihi platform, midden and several possible defensive features. In considering both the proposed access way and house platform position, under the current proposal it is not possible to develop allotment 1 without encroaching on the scheduled boundary of S11/74. Specifically, the western boundary of the proposed house platform falls within the scheduled area of S11/74 on the eastern slopes of the site. However, because the extant farm access track is a modified cutting and no evidence of archaeological remains were identified within this area, it would be possible to reduce the scheduled boundary of the site to the north around S11/74 to allow access to a house platform in this portion of the property. This modification would have to be at the discretion of ACC and negotiated between the ACC and the landowner M. Fisher. However, it is the author’s opinion that the existing boundary on the eastern slopes below the crest of the ridge is minimal, given the size and complexity of S11/74 and should be maintained to protect the integrity of the site. The simple solution would be to move the proposed house site possibly below the extant farm access way and further away from S11/74. This would serve to protect the site’s scheduled boundary, the aesthetic value of the site, and could well be achieved with minimal complication to the landowner. Should the ACC decide otherwise and provide consent to build in the proposed scheduled area of the current boundary, an authority from the Historic Places Trust would need to be sought and obtained prior to any modification necessary for the development of proposed house site 1, Allotment 1”.

“Recommendations:

- That at the discretion of ACC, the scheduled boundary around S11/74 could be reduced to the north to provide vehicle access to a house platform in this area of the proposed Allotment 1.
- That the existing scheduled boundary on the eastern side of S11/74 be maintained to protect the integrity of the site. That the alternate proposed house site 1 Allotment 1 be repositioned to the east to avoid the scheduled boundary of S11/74 on the site’s eastern side.

- That should the ACC decide to provide consent for a house site within this boundary, or the immediate vicinity, that an application to modify/damage or destroy an archaeological site be sought and obtained under section 11 of the Historic Places Act (1993) prior to the commencement of any ground disturbance that may impact on site S11/74. (Note that this is a legal requirement).”

Issue Raised **DP Map Ref: 33-3**
 Reduce the boundaries of scheduled archaeological site 33-3 to cover clearly definable tool-making sites which from evidence and reports, are the only significant sites of value. (Plan attached to submission).

Submission Numbers 1248/1, 1249/1

Comments From the Archaeological Site Information form it is clear that this site covers most of Home Bay, on the beach and intertidal zone. Namely, from above MHWS to low water. The site area currently shown on map 33-3 and also included within site surround map 33-8 could be realigned so as not to extend inland beyond the beach but should extend over the whole beach and above MHWS.

Issue Raised **DP Map Ref: 33-3**
 Realign the boundaries of scheduled archaeological site 33-3 so that the area above the mean high water mark is not classified as category A.

Submission Numbers 1248/2, 1249/2

Comments From the Archaeological Site Information form it is clear that this site covers most of Home Bay, on the beach and intertidal zone. Namely, from above MHWS to low water. The site area currently shown on map 33-3 and also included within site surround map 33-8 could be realigned so as not to extend inland beyond the beach but should extend over the whole beach and above MHWS.

Issue Raised **DP Map Ref: 33-3**
 The Plan needs to allow access for launching a boat on the western side of the jetty within scheduled archaeological site 33-3.

Submission Numbers 1248/3, 1249/3

Comments Agree that if boat launching is an established activity it would be appropriate to make provision for it as it does not appear to have affected the site to date.

Issue Raised	7.8 For Council's consultant archaeologists to visit the property (Lot 2 DP 194989 Orapiu Road, Omaru Bay, Waiheke) and an adjacent property to assess the merits of other potential archaeological sites.
Submission Numbers	1274/12
Comments	Archaeologists have subsequently visited this property (Plowman and Clough Mar 2007).
Issue Raised	7.8 Amend clause 7.8 to state the following or similar: The archaeological heritage of the islands comprises an underlying and often invisible record of past activity ... Archaeological sites ..., by definition can include above surface, surface and subsurface components.
Submission Numbers	2641/19
Comments	Submission is requesting the inclusion of the phrase "above surface" in the clause "Archaeological sites ...by definition can include (above surface) surface and subsurface components". Agree with this submission and the inclusion of this wording.
Issue Raised	7.8.5 Amend clause 7.8.5 to state (under C=Buildings and other structures) the following or similar: Sites which include buildings and other structures/features within the curtilage, or the remains of buildings and other structures/features within the curtilage.
Submission Numbers	2641/23
Comments	It could be specified if curtilage around buildings, structures/features is relevant to a particular site, but should not be an automatic inclusion.
Issue Raised	Table 7.1 Delete all references to prohibited activities in Table 7.1
Submission Numbers	526/18, 527/18, 528/18, 529/18, 539/18
Comments	Reject - Table 7.1 pertains to category A archaeological sites and Table 7.2 pertains to category B archaeological sites and the prohibited activities are grazing by heavy animals – in table 7.1 this affects archaeological earthworks large and small scale and archaeological deposits, and in Table 7.2 it only affects archaeological deposits. Heavy animals are known to create considerable damage to any archaeological site in certain conditions, therefore, grazing by heavy animals should remain prohibited as per the activity table as it would be detrimental to the integrity of these highly valued archaeological sites.

Issue Raised **Table 7.1**
To acknowledge and provide for existing farming and grazing operations including areas of the company's (Thumb Point Station Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.1.

Submission Numbers 526/16

Issue Raised To acknowledge and provide for existing farming and grazing operations including areas of the company's (Man O'War Farm Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.1

Submission Numbers 527/16

Issue Raised To acknowledge and provide for existing farming and grazing operations including areas of the company's (Huruhe Station Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.1.

Submission Numbers 528/16

Issue Raised To acknowledge and provide for existing farming and grazing operations including areas of the company's (Man O'War Station Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.1.

Submission Numbers 529/16

Issue Raised To acknowledge and provide for existing farming and grazing operations including areas of the company's (South Coast Station Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.1.

Submission Numbers 539/16

Comments (Submissions 526/16, 527/16, 528/16, 529/16, 539/16)

Reject. Table 7.1 pertains to category A archaeological sites, which are “extremely valuable archaeological sites that, when assessed against the relevant criteria, were considered to have heritage significance beyond their immediate surrounds. Their loss or degradation would be unacceptable in terms of achieving the purpose of the RMA. These sites therefore need to be preserved”. Inappropriate farming and grazing operations that cause considerable damage to these archaeological sites, irrespective of whether they have occurred in the past, should remain prohibited or controlled as per the activity table.

Issue Raised **Table 7.1**
The management group Type E (archaeological deposits), where it is not practical to exclude the types of stock for which consent is required for, or which are prohibited from, provide for the necessary consent to be a controlled activity, which will be issued free of charge (see Table 7.1)

Submission Numbers 1243/56

Comments Reject. Table 7.1 pertains to category A archaeological sites, which are “extremely valuable archaeological sites that, when assessed against the relevant criteria, were considered to have heritage significance beyond their immediate surrounds. Their loss or degradation would be unacceptable in terms of achieving the purpose of the RMA. These sites therefore need to be preserved”. Heavy animals are known to create considerable damage to any archaeological site in certain conditions, therefore, grazing by heavy animals should remain prohibited as per the activity table as it would be detrimental to the integrity of these highly valued archaeological sites. Consents for heritage matters are already free of charge.

Issue Raised **Table 7.2**
The management group Type E (archaeological deposits), where it is not practical to exclude the types of stock for which consent is required for, or which are prohibited from, provide for the necessary consent to be a controlled activity, which will be issued free of charge (see Table 7.2).

Submission Numbers 1243/57

Comments Reject. Table 7.1 pertains to category A archaeological sites, which are “extremely valuable archaeological sites that, when assessed against the relevant criteria, were considered to have heritage significance beyond their immediate surrounds. Their loss or degradation would be unacceptable in terms of achieving the purpose of the RMA. These sites therefore need to be preserved”. Heavy animals are known to create considerable damage to any archaeological site in certain conditions, therefore, grazing by heavy animals should remain prohibited as per the activity table as it would be detrimental to the integrity of these highly valued archaeological sites. Consents for heritage matters are already free of charge.

Issue Raised **Table 7.1 and Table 2**
That grazing by heavy animals be deleted from Table 7.1 and Table 7.2 as it relates to management group Types C and D.

Submission Numbers 1269/1, 1269/2

Issue Raised **Table 7.1 and Table 2**
That grazing by heavy animals in management group Types C and D be a permitted activity in Table 7.1 and Table 7.2.

Submission Numbers 1269/ 3, 1269/4

Issue Raised **Table 2**
Amend Table 7.2: Activity table for category B scheduled archaeological sites (in part 7 – Heritage), by inserting ‘NC’ in place of ‘Pr’ (prohibited) in the ‘feature type E column of row 11 (‘Grazing by heavy animals – i.e. cattle, horses’). Amend the legend below the Table 7.2 by deleting ‘Pr=Prohibited’.

Submission Numbers 2091/3

Issue Raised **Table 2**
Seeks a change to Activity 11 in Table 7.2 to make grazing of heavy animals P permitted, so that the property owners are free to make decision in accordance with the needs of the land. The size and number of animals should also be at the property owner’s discretion.

Submission Numbers 3547/1

Comments (Submissions 1269/1, 1269/2, 1269/ 3, 1269/4, 2091/3, 2091/3)

Reject. Table 7.1 pertains to category A archaeological sites, which are “extremely valuable archaeological sites that, when assessed against the relevant criteria, were considered to have heritage significance beyond their immediate surrounds. Their loss or degradation would be unacceptable in terms of achieving the purpose of the RMA. These sites therefore need to be preserved”. Table 7.2 pertains to category B archaeological sites, which “Although these sites are considered to be less significant than category A sites, it is still important for the features to be protected from inappropriate use and development, having regard to the effect of a proposal on the heritage values of the scheduled item, and the applicant’s objectives and reasons for the proposed use or development. Therefore, the partial loss or modification of category B sites may be acceptable where there is no alternative and everything has been done to avoid, remedy or mitigate any adverse effects”.

Heavy animals are known to create considerable damage to any archaeological site in certain conditions, therefore, grazing by heavy animals should remain prohibited or controlled as per activity tables 7.1 and 7.2 as it would be detrimental to the integrity of these highly valued archaeological sites.

Issue Raised

Table 7.1

Amend table 7.1: Activity table for category A scheduled archaeological (in part 7 – Heritage), by inserting ‘NC’ on place of ‘Pr’ (Prohibited) wherever it occurs in row 11 (‘Grazing by heavy animals – i.e. cattle, horses’). Amend the legend below the table 7.1 by adding ‘NC = Non-complying’ after the line ‘D = Discretionary’. Deleting ‘PR = Prohibited’.

**Submission
Numbers
Comments**

2091/1

Table 7.1 pertains to category A archaeological sites, which are “extremely valuable archaeological sites that, when assessed against the relevant criteria, were considered to have heritage significance beyond their immediate surrounds. Their loss or degradation would be unacceptable in terms of achieving the purpose of the RMA. These sites therefore need to be preserved”. Heavy animals are known to create considerable damage to any archaeological site in certain conditions, therefore, grazing by heavy animals should remain prohibited as per activity table 7.1 as it would be detrimental to the integrity of these highly valued archaeological sites.

Issue Raised

Table 7.1 and Table 7.2

Insert the following wording into activity Table 7.1 as a permitted activity: “**Light grazing** of cattle on any archaeological site on land falling within the Conservation Land Unit, and either managed directly by Department of Conservation operational staff, or undertaken in accordance with DOC approved concession issued by the Minister of Conservation under Part 3B of the Conservation Act 1987”.

**Submission
Numbers**

2520/1

Issue Raised

Table 7.1 and Table 7.2

Insert the following wording into activity Table 7.2 as a permitted activity: “**Light grazing** of cattle on any archaeological site on land falling within the Conservation Land Unit, and either managed directly by Department of Conservation operational staff, or undertaken in accordance with DOC approved concession issued by the Minister of Conservation under Part 3B of the Conservation Act 1987”.

**Submission
Numbers**

2520/2

Comments

(Submissions 2520/1, 2520/2)

Reject. Table 7.1 pertains to category A archaeological sites, which are “extremely valuable archaeological sites that, when assessed against the relevant criteria, were considered to have heritage significance beyond their immediate surrounds. Their loss or degradation would be unacceptable in terms of achieving the purpose of the RMA. These sites therefore need to be preserved”. Table 7.2 pertains to category B archaeological sites, which “Although these sites are considered to be less significant than category A sites, it is still important for the features to be protected from inappropriate use and development, having regard to the effect of a proposal on the heritage values of the scheduled item, and the applicant’s objectives and reasons for the proposed use or development. Therefore, the partial loss or modification of category B sites may be acceptable where there is no alternative and everything has been done to avoid, remedy or mitigate any adverse effects”. Heavy animals are known to create considerable damage to any archaeological site in certain conditions, therefore, grazing by heavy animals should remain prohibited or controlled as per activity tables 7.1 and 7.2 as it would be detrimental to the integrity of these highly valued archaeological sites. The grazing of “light animals” i.e. sheep, on scheduled archaeological sites is a permitted activity in both tables 7.1 and 7.2.

Issue Raised**Table 7.1**

Amend the Plan to ensure the consideration of the impact on (potential) Maori heritage sites or cultural values for activities affecting scheduled archaeological sites. This could be achieved, for example, through amending the status of all ‘restricted discretionary’ activities identified within Table 7.1 to full ‘discretionary’ activities.

**Submission
Numbers
Comments**

2641/26

According to the District Plan at the time of notification of the Plan, Maori heritage sites were not included because essential information collected by the council about archaeological sites had not yet been considered by iwi. This information will assist iwi to determine which Maori heritage sites or areas to request for inclusion in the Plan, whether these are archaeological sites or not.

This submitter (NZHPT) considers that there is no ability to consider the impact of any proposed works on (potential) Maori heritage sites or cultural values even when activities affect scheduled category A archaeological sites in table 7.1. They refer specifically to matters of discretion for restricted discretionary activities (7.8.6), which do not include considering Maori heritage values associated with these scheduled archaeological sites. The submitter has suggested amending the status of all ‘restricted discretionary’ activities identified within Table 7.1 to full ‘discretionary’ activities. An alternative is to include as a matter for consideration the affect of the proposed activity on Maori heritage values for restricted discretionary activities (7.8.6).

Issue Raised **Table 7.2**
To acknowledge and provide for existing farming and grazing operations including areas of the company's (Thumb Point Station Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.2.

Submission Numbers 526/17

Issue Raised **Table 7.2**
To acknowledge and provide for existing farming and grazing operations including areas of the company's (Man O'War Farm Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.2.

Submission Numbers 527/17

Issue Raised **Table 7.2**
To acknowledge and provide for existing farming and grazing operations including areas of the company's (Huruhe Station Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.2.

Submission Numbers 528/17

Issue Raised **Table 7.2**
To acknowledge and provide for existing farming and grazing operations including areas of the company's (Man O'War Station Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.2.

Submission Numbers 529/17

Issue Raised **Table 7.2**
To acknowledge and provide for existing farming and grazing operations including areas of the company's (South Coast Station Ltd) land covered by rules in Part 7 of the Plan particularly, Table 7.2.

Submission Numbers 539/17

Comments (Submissions 526/17, 527/17, 528/17, 529/17, 539/17)

Reject. Table 7.2 pertains to category B archaeological sites, which “Although these sites are considered to be less significant than category A sites, it is still important for the features to be protected from inappropriate use and development, having regard to the effect of a proposal on the heritage values of the scheduled item, and the applicant’s objectives and reasons for the proposed use or development. Therefore, the partial loss or modification of category B sites may be acceptable where there is no alternative and everything has been done to avoid, remedy or mitigate any adverse effects”. Inappropriate farming and grazing operations that cause considerable damage to these archaeological sites, irrespective of whether they have occurred in the past, should remain controlled as per the activity table.

Issue Raised **Table 7.2**
Delete all references to prohibited activities in Table 7.2.

Submission Numbers 526/19, 527/19, 528/19, 529/19, 539/19

Comments Reject. Table 7.2 pertains to category B archaeological sites, which “Although these sites are considered to be less significant than category A sites, it is still important for the features to be protected from inappropriate use and development, having regard to the effect of a proposal on the heritage values of the scheduled item, and the applicant’s objectives and reasons for the proposed use or development. Therefore, the partial loss or modification of category B sites may be acceptable where there is no alternative and everything has been done to avoid, remedy or mitigate any adverse effects”. The only prohibited activity in Table 7.2 relates to 11. Grazing by heavy animals i.e. cattle or horses on management group type E = Archaeological deposits, which are “deposits of food, cooking debris, or deposition of artefacts associated with settlement or use of landscape (includes midden, stone working floors)”. Council could consider a review to change this activity on this management group type to a non-complying activity or conditional of some sort rather than prohibited.

Issue Raised **Table 7.2**
That permitted activities for most of this area (scheduled archaeological site S11/0737, map ref 18-5) includes normal vineyard activities.

Submission Numbers 834/2

Comments ‘Vineyard activities’ are not specific enough to be permitted, as they could include ground disturbance. However, the inclusion of this site may not be warranted, as the date and archaeological potential of the features are not clear. The scores assigned should be reviewed.

Issue Raised	Table 7.2 Amend the Plan to ensure the consideration of the impact on (potential) Maori heritage sites or cultural values for activities affecting scheduled archaeological sites. This could be achieved, for example, through amending the status of all ‘restricted discretionary’ activities identified within Table 7.2 to full ‘discretionary’ activities.
Submission Numbers	2641/27
Comments	<p>According to the District Plan at the time of notification of the Plan, Maori heritage sites were not included because essential information collected by the council about archaeological sites had not yet been considered by iwi. This information will assist iwi to determine which Maori heritage sites or areas to request for inclusion in the Plan, whether these are archaeological sites or not.</p> <p>This submitter (NZHPT) considers that there is no ability to consider the impact of any proposed works on (potential) Maori heritage sites or cultural values even when activities affect scheduled category B archaeological sites in table 7.2. They refer specifically to matters of discretion for restricted discretionary activities (7.8.6), which do not include considering Maori heritage values associated with these scheduled archaeological sites. The submitter has suggested amending the status of all ‘restricted discretionary’ activities identified within Table 7.2 to full ‘discretionary’ activities. An alternative is to include as a matter for consideration the affect of the proposed activity on Maori heritage values for restricted discretionary activities (7.8.6).</p>

Issue Raised	Table 7.2 The activity 8 in Table 7.2 be designated a P for permitted activity to allow the property owners the unrestricted ability to maintain the power lines and water irrigation as needed in this area.
Submission Numbers	3548/1
Comments	<p>Reject. Table 7.2 pertains to category B archaeological sites, which “Although these sites are considered to be less significant than category A sites, it is still important for the features to be protected from inappropriate use and development, having regard to the effect of a proposal on the heritage values of the scheduled item, and the applicant’s objectives and reasons for the proposed use or development. Therefore, the partial loss or modification of category B sites may be acceptable where there is no alternative and everything has been done to avoid, remedy or mitigate any adverse effects”. Activity 8. relates to the “Construction, replacement or upgrading of utility services by trenching, underground thrusting or directional drilling”. This activity can cause considerable damage to these archaeological sites, irrespective of whether they have occurred in the past or are for maintenance on existing structures, and therefore, should remain controlled as per the activity table.</p>

Issue Raised	Table 7.2 An exemption under Table 7.2 which allows earthworks to be carried out, specifically for the preparation of a new grave site, which do not modify the existing heritage features (being the existing graves map ref 9-3) in any way, as a permitted activity.
Submission Numbers	1271/4
Comments	This should be acceptable.

Issues	Appendix A1a Take appropriate action to remedy the shortcomings identified regarding gaps in the listing of sites of archaeological significance e. g. Okoka Bay.
Submission Numbers	298/4, 380/4, 568/4, 586/4, 628/4, 634/4, 636/4, 646/4, 665/4, 673/4, 696/4, 706/4, 731/4, 736/4, 748/4, 802/4, 819/4, 828/4, 837/4, 844/4, 850/4, 858/4, 871/4, 89/4, 893/4, 902/4, 925/4, 928/4, 957/4, 1011/4, 1055/4, 1123/4, 1152/4, 1204/4, 1216/4, 1232/4, 1291/4, 1375/4, 1637/4, 1638/4, 1639/4, 1640/4, 1641/4, 1642/4, 1643/4, 1644/4, 1645/4, 1646/4, 1647/4, 1648/4, 1649/4, 1650/4, 1651/4, 1652/4, 1653/4, 1655/4, 1656/4, 1657/4, 1658/4, 1659/4, 1660/4, 1662/4, 1663/4, 2124/4, 2131/4, 2133/4, 2278/4, 2283/4, 2463/4, 2561/4, 2675/4, 2679/4, 2684/4, 2691/4, 2695/4, 2706/4, 2710/4, 2780/4, 2782/4, 2791/4, 2826/4, 2830/4, 2842/4, 2994/4, 3009/4, 3011/4, 3025/4, 3061/4, 3513/4, 3536/4, 3561/4, 3569/4, 3573/4, 3589/4, 3628/4, 3786/4, 3806/4, 3814/4, 3817/4, 3836/4, 3838/31
Comments	This only refers to Okoka Bay by name – a does it implicitly imply other areas, and if so which? Okoka Bay area is to be protected through Maori schedule as wahi tapu – archaeological sites did not score highly enough individually. It is hard to know where the gaps being referred to are. See comments listed in A1a below. The archaeological sites in Okoka Bay were reviewed, but individually did not score highly enough to be scheduled. They remain protected under the Historic Places Act 1993. The area is registered with the New Zealand Historic Places Trust as a Wahi Tapu area, and Auckland City Council recognises it as such. The intention is to include the area in the Maori Heritage schedule when it is completed.

Issue Raised	Appendix A1a Opposes the gaps in the listing of sites of archaeological significance e.g. Okoka Bay.
Submission Numbers	709/9, 3354/4, 3832/4

Comments The archaeological sites in Okoka Bay were reviewed, but individually did not score highly enough to be scheduled. They remain protected under the Historic Places Act 1993. The area is registered with the New Zealand Historic Places Trust as a Wahi Tapu area, and Auckland City Council recognises it as such. The intention is to include the area in the Maori Heritage schedule when it is completed.

Issue Raised **Appendix A1a**
Undertake the relevant assessments under the criteria contained in Appendix 4, and on that basis include the following identified archaeological sites on Motutapu Island in appendix 1a and amend the maps accordingly:

Archaeological Sites

<i>DOC ref</i>	<i>Easting</i>	<i>Northing</i>	<i>Description of site</i>	<i>Location</i>
R10/23	2679500	6491800	Headland Pa	Western coast
R10/48	2681400	6493400	Archaic midden	Sandy Bay
R10/51	2681000	6492700	Headland Pa	Administration Bay
R10/108	2680700	6491800	Ridge Pa	Behind Pig Bay
R10/115	2679700	6490350	Headland Pa	Causeway
R10/214	2679800	6490100	Headland Pa	Causeway
R10/337	2681500	6494100	Headland Pa	North of Sandy Bay
R10/144	2679900	6489800	Ridge Pa	Islington Bay
R10/146	2681100	6488300	Headland Pa	Emu Bay
R10/147	2681100	6487800	Headland Pa	Emu Point
R10/218	2682500	6489000	Headland Pa	Otahuhu Point

Submission Numbers 2503/3

Comments Part of Motutapu was surveyed and assessed in early 2003. The data collected was not processed sufficiently to be included in the plan. All but two of the above sites were assessed and scored highly enough to be scheduled in the plan. Site R11/144 (not R10/144 as above) was joined with site R10/214 by our archaeologists for the purposes of the review. Auckland City Council has said in the Plan that a variation or plan change will be introduced to the Plan so that additional heritage resources on these islands will be recognised and protected in the future. Meanwhile all archaeological sites are protected under the Historic Places Act 1993.

Issue Raised **Appendix A1a**
That once archaeological surveys and/or excavations have been done on each of these specific sites that they be reassessed for inclusion or not within the scheduled archaeological site.

Submission Numbers 721/4

Comments Reject. The sites specified in this submission are DP map ref 17-2 (S11/712) and 17-6 (S11/710). These recorded archaeological sites were surveyed, assessed and reviewed in 2002 as part of the ACC District Plan process. As a result these two sites were scheduled in the proposed District Plan as category B archaeological sites, which “Although these sites are considered to be less significant than category A sites, it is still important for the features to be protected from inappropriate use and development, having regard to the effect of a proposal on the heritage values of the scheduled item, and the applicant’s objectives and reasons for the proposed use or development. Therefore, the partial loss or modification of category B sites may be acceptable where there is no alternative and everything has been done to avoid, remedy or mitigate any adverse effects”.

Issue Raised **Appendix A1a**
That more effort is made to specify the exact middens, pits and terraces instead of including a large area of land that does not have any of these features.

Submission Numbers 721/1
Comments

Possibly. The sites specified in this submission are DP map ref 17-2 (S11/712) and 17-6 (S11/710). These recorded archaeological sites were surveyed, assessed and reviewed in 2002 as part of the ACC District Plan process. As a result these two sites were scheduled in the proposed District Plan as category B archaeological sites, which “Although these sites are considered to be less significant than category A sites, it is still important for the features to be protected from inappropriate use and development, having regard to the effect of a proposal on the heritage values of the scheduled item, and the applicant’s objectives and reasons for the proposed use or development. Therefore, the partial loss or modification of category B sites may be acceptable where there is no alternative and everything has been done to avoid, remedy or mitigate any adverse effects”.

In relation to site 17-6 I cannot relate the archaeologist’s site plan (does not show the position of building or GPS points in relation to archaeological features) to the proposed site area or to the submitter’s plan of where they believe the five archaeological ‘sites’ (features?) to be. However, according to the site information pack there are in fact fourteen archaeological terrace features and midden scatter. The submitter’s house and garden are located within the site surround, which according to his submission was consented in 1995 by Council. Given the confusion surrounding these sites and the inadequate site plans perhaps these sites should be revisited and assessed by archaeologists. The submitter should be made aware that archaeological sites can include surface and subsurface components and that subsurface components often extend between and beyond visible surface features.

In relation to site 17-2 I cannot relate the archaeologist’s site plan (does not show the position of GPS points in relation to archaeological features) to the proposed site area.

Issue Raised	Appendix A1a Seeks a heritage classification of the Pa site (pit and terracing) on Crosby Reserve (50 Fairview Crescent, Rocky Bay). Reference planning maps sheet 15, map 2.
Submission Numbers	3176/1
Comments	This is recorded archaeological site S11/826. It was assessed on 7 February 2003 as part of our review process. It did not score highly enough at that time to reach the threshold for Auckland City Council to protect it via the District Plan. The archaeological report concluded the context has been destroyed and overall the site is suffering erosion and the features are heavily modified. This site remains protected under the Historic Places Act 1993.

Issue Raised	Appendix A4.1 Consider amendments to 1.0 of Appendix 4 to address concerns raised regarding: the rating system being slanted towards the typically larger and more complex sites; the fact that visual assessments cannot be made accurately for many sites; the grouping (e) of sites; the need for (g) setting to provide for higher protection of last remnant sites; and the lack of consideration of Maori cultural values.
Submission Numbers	2641/61
Comments	<p>The bias towards larger and more complex sites reflects the likelihood that these sites have a greater ability to provide meaningful heritage information. We make no apology for ensuring these larger sites have some priority. Complexity is a well established and recognised criterion in assessing the significance of archaeological sites.</p> <p>While we recognise that visual assessment has its limitations, this remains the primary methodology for archaeology survey in New Zealand, as further information can generally only be established through invasive investigation. The assessment process, though, can include non-visual information. The evaluation forms are based on evidence provided in whatever form. We cannot directly evaluate non-evidence in any methodological sense. It should be noted though that the evaluations are designed to be carried out by experienced NZ archaeologists (commonly in pairs), who not only identify the features present but are generally trained to evaluate the context of those features. The archaeologists are also required to provide information within the evaluation form as to how they scored. Unless other information can be obtained in a specific case, the assessment stands.</p> <p>The submitter does not refer to what concerns they actually have regarding the grouping of sites.</p> <p>The ‘setting’ evaluation neither specifically enhances nor inhibits values associated with remnant sites and is not ‘needed’ to provide higher protection for ‘last remnant sites’. While the last remnant of a site or the last archaeological remnant of a once wider landscape may or may not gain value in relation to setting, it is likely that it would gain value in the ‘rarity’ criterion.</p>

The ranking system does not **preclude** consideration of Maori cultural values. It proved impractical (and inappropriate) for archaeologists to evaluate Maori cultural values as part of the assessment of the archaeological significance. The Maori values of archaeological sites, and places and areas that may have no archaeological values, were assessed as part of the Maori Heritage schedule.

We see no reason to amend 1.0 of Appendix 4. based on the submission provided.

Issue Raised

Appendix A4.1

Amend in Appendix 4 the criteria for scheduling archaeological sites to refer not only to community association with and public esteem for (Criteria J) but also to ancestral relationships held by Maori.

Submission Numbers

3521/153

Comments

Reject. We see no reason to amend the criteria for scheduling archaeological sites in Appendix 4 based on the submission provided. The ranking system does not **preclude** consideration of Maori cultural values. It proved impractical (and inappropriate) for archaeologists to evaluate Maori cultural values as part of the assessment of the archaeological significance. The Maori values of archaeological sites, and places and areas that may have no archaeological values, were assessed as part of the Maori Heritage schedule. However, the evaluation scheme allows for any information regarding ‘Community association with or public esteem for (k)’. This was designed to capture any **known** information regarding an archaeological site regardless of its cultural background. Is the suggestion that Maori are not part of the ‘community’ or ‘public’?
