

IN THE MATTER

of the Resource Management
Act 1991

BY

Waipa District Council

FOR

Proposed Plan Change 13 –
Uplifting Deferred Zones.

**STATEMENT OF EVIDENCE OF ELEANOR STURROCK FOR
HERITAGE NEW ZEALAND POUHERE TAONGA**

INTRODUCTION

1. My full name is Eleanor Jeneen Sturrock.
2. I have a Bachelor of Arts in Archaeology (2011), and a Master of Arts in Anthropology (2013) from the University of Auckland.
3. I have been actively involved in New Zealand archaeology for 8 years and am a member of the New Zealand Archaeological Association (the NZAA).
4. I am an Archaeologist for Heritage New Zealand Pouhere Taonga's Lower Northern Area (Waikato, Bay of Plenty and Gisborne), based in the Tauranga Office. I have worked as an archaeologist for Heritage New Zealand Pouhere Taonga (HNZPT) since June 2016.
5. I am responsible for advocating for the protection and management of New Zealand's archaeological sites and ensuring that any person wanting to damage or modify a site complies with the provisions of the Heritage New Zealand Pouhere Taonga Act 2014.
6. I have read, understood and will comply with the Environment Court's Code of Conduct for Expert Witnesses contained in the Environment Court of New Zealand Practice Note 2014 and have complied with it in preparing this evidence. I also agree to comply with the Code when presenting evidence. The evidence I give is within my area of expertise and represents my best knowledge about this matter. I have not omitted to consider material facts known to me which might alter or detract from the opinions I express.
7. I undertook a site visit to 3774 Cambridge Road on 10 June 2021. I was accompanied by Senior Archaeologist Dr. Rachel Darmody and Senior Planner Carolyn McAlley from HNZPT and have driven by the other subject properties in relation to Growth Cell C4.

SCOPE OF EVIDENCE

8. My evidence is given in support of Heritage New Zealand's position in respect of the Waipa District Proposed Plan Change 13 – Uplifting Deferred Zones.
9. In my evidence I will:
 - a. Briefly outline the role of Heritage New Zealand Pouhere Taonga and explain the requirements under the Heritage New Zealand Pouhere Taonga Act 2014 for archaeological authorities;
 - b. Outline my concern that there is insufficient archaeological information to understand the significance of archaeology and the effects of the proposed plan change on any archaeology;
 - c. Comment that part of the Maori horticultural landscape which has been identified within Growth Cell C4 should be protected as part of this decision-making process.
 - c. Recommend, that as part of this planning process the archaeological assessment for Growth Cell C4 is revised to adequately evaluate the archaeology and that the other structure plan locations are assessed to ascertain the presence or absence of archaeological sites and evaluate the significance of any archaeology present.

THE ROLE OF HERITAGE NEW ZEALAND POUHERE TAONGA

10. Heritage New Zealand is an autonomous Crown Entity constituted under the Heritage New Zealand Pouhere Taonga Act 2014, and within the Ministry for Culture and Heritage portfolio. It is governed by a Board and a Maori Heritage Council. Its purpose is to provide for the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand.

11. Heritage New Zealand is the national statutory authority responsible for archaeological site protection. Section 44 of the Heritage New Zealand Pouhere Taonga Act 2014 directs that an authority is required from Heritage New Zealand in order to modify or destroy any archaeological site or sites (recorded or unrecorded).
12. An authority is required whether or not the land on which an archaeological site may be present is designated, a resource or building consent has been granted, or the proposed activity is permitted under the relevant Regional or District Plan.
13. One of Heritage New Zealand's roles is therefore to manage the process of permitting modification or destruction of archaeological sites through the issuing of archaeological authorities.

INSUFFICIENT ARCHAEOLOGICAL INFORMATION

TOPIC 1 ALL OF PLAN

14. To my knowledge no archaeological assessments have been completed for the structure plan locations to identify the presence or absence of archaeological sites, except for Growth Cell C4.
15. Results of previous archaeological investigations in the Cambridge and Leamington show that the area is part of an extensive Maori Horticultural landscape which forms a significant component of the archaeological record in the Waikato Basin. An archaeological assessment should be completed for the proposed structure plan change areas to identify any recorded or unrecorded archaeological evidence and understand its significance.

TOPIC 4 GROWTH CELL C4 STRUCTURE PLAN

16. I have read the archaeological assessment prepared by Ellen Cameron and Rod Clough ("Cambridge, Growth Cell C4 Structure Plan: Preliminary Archaeological Assessment", August 2019).
17. The preliminary report identified the six archaeological sites that had previously been recorded on the subject land. These sites consist of

a pa site (S15/23) and five complexes of borrow pits and modified garden soil sites (S15/521, S15/637, S15/638, S15/701 and S15/807).

18. Growth Cell C4 has only been partially field surveyed by an archaeologist. Thirteen of the subject properties within Growth Cell C4 were not accessed for the field survey. The assessment notes that there is the potential for additional unrecorded archaeological remains to be present within Growth Cell C4. Unidentified archaeological evidence could be located on the subject properties which have not been field surveyed to date.
19. The methodology for the field survey was inadequate. The field survey was conducted on 25 July 2019 which involved subsurface testing with a probe and examining any exposed or disturbed soils. Current archaeological practice for assessing Maori horticultural landscapes in Cambridge usually involves a soil hand-auger survey to identify the presence/absence and extent of gardening soils and to assess the condition of the evidence. S15/521 and S15/638 have previously been assessed using this methodology and demonstrate the level of information that can be obtained. The preliminary assessment does not name who carried out the field survey, so I do not know the level of experience of the individual(s) with Maori gardening landscapes in the Cambridge area.
20. Cameron and Clough state that the borrow pit sites are considered to have limited archaeological values based on the criteria assessed and that it is not considered likely that the borrow pit features would contribute any significant new information to the understanding of Maori horticultural practices. I disagree because the borrow pits should not be considered as isolated archaeological evidence. Borrow pits are part of a larger gardening system, the majority of which is not visible on the ground surface. Pre-European Maori horticultural practices provide evidence of how Polynesian garden techniques were adapted to a temperate climatic environment with different soil constraints. There are significant archaeological values associated with these horticultural sites.

21. Part of the Maori horticultural landscape which has been identified within Growth Cell C4 including borrow pit features should be protected as part of this decision-making process. Based on the site survey there are at least 32 borrow pit features, many of which are in good condition with no obvious impacts and are highly visible based on the site visit I undertook.
22. The assessment notes that the specific level of effects to the archaeological sites and broader archaeological landscape has yet to be determined.
23. Heritage New Zealand Pouhere Taonga received an authority application from Kotare Properties Limited on 23 March 2021 in relation to 3774 Cambridge Road. The application was not accepted because it was determined as incomplete. It was returned because there was not enough information for Heritage New Zealand to make a decision based on the information provided in the archaeological assessment completed by Ellen Cameron (Clough and Associates Ltd).

CONCLUSION

24. The archaeological authority process under the Heritage New Zealand Pouhere Taonga Act 2014 does not remove the necessity for Council to satisfy its own requirements under the Resource Management Act 1991 to consider archaeological sites including the need for a full understanding of its value when planning development.
25. There have been no archaeological assessments completed for the structure plans except for Growth Cell C4, which is only a preliminary assessment and does not provide enough information to adequately evaluate the significance of the archaeological sites and assess the impacts of the proposed development on the archaeology within the C4 Growth Cell. It is of concern that this structure plan change is being determined based on limited archaeological information.

26. This process should give regard to what archaeological evidence can be preserved and protected to ensure future subdivision and development can be designed and managed appropriately in relation to significant archaeological values.
27. On the basis of the current information, I recommend that the archaeological assessment for Growth Cell C4 is revised to adequately evaluate the significance of the archaeology and that the other structure plan locations are assessed to ascertain the presence or absence of archaeological sites and evaluate the significance of any archaeology.

Dated 11 June 2021



Eleanor Sturrock

