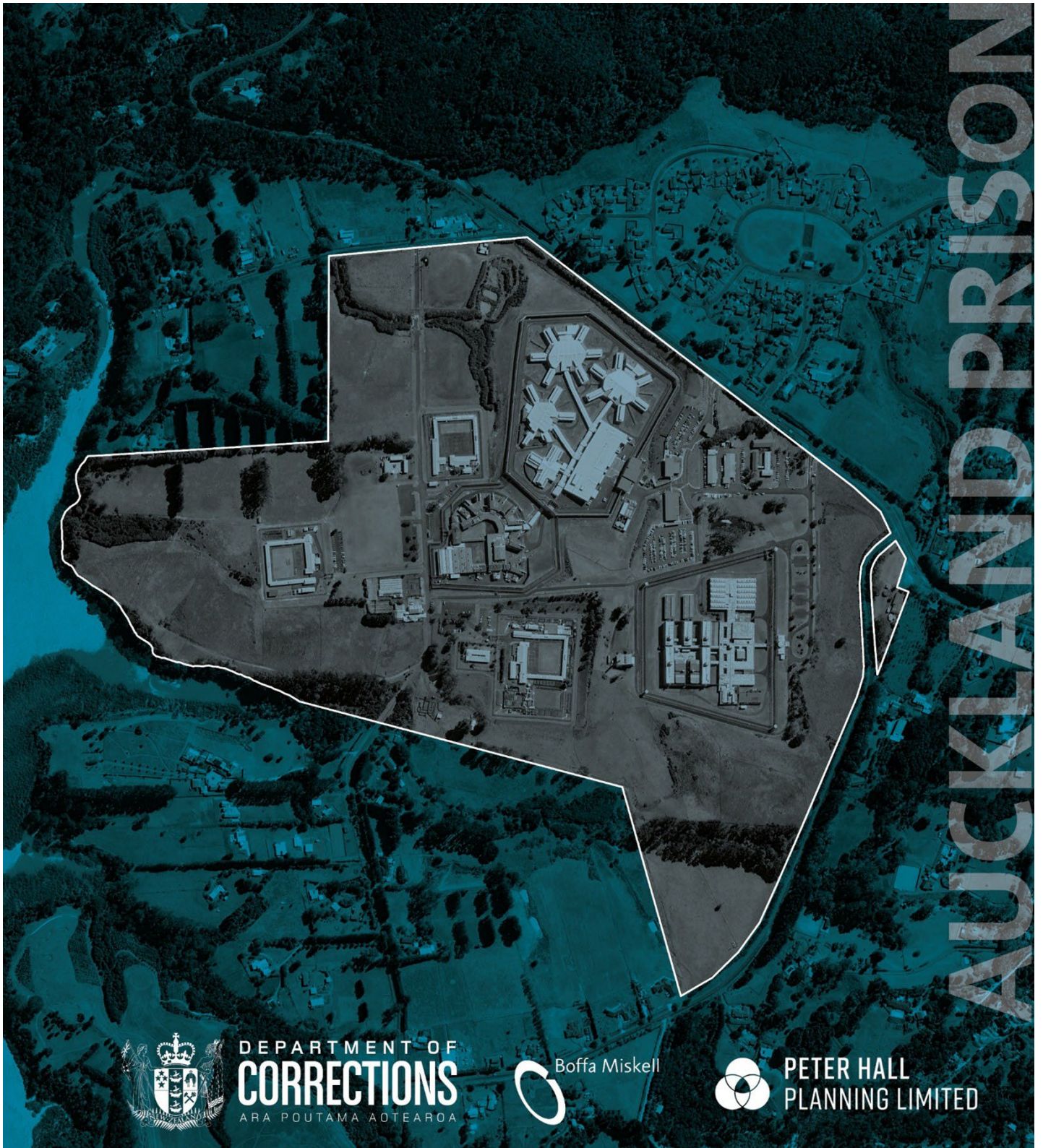


Auckland Prison Capacity Increase

Volume 2 – Appendix 2G
Archaeological Assessment



DEPARTMENT OF
CORRECTIONS
ARA POUTAMA AOTEAROA



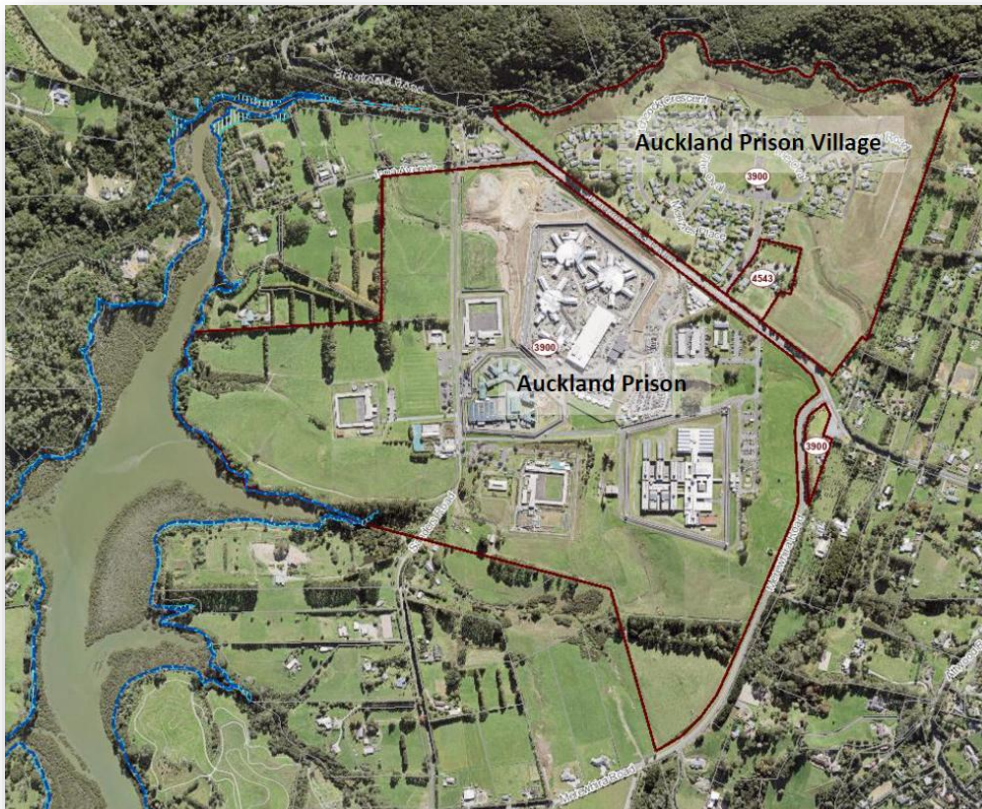
Boffa Miskell



PETER HALL
PLANNING LIMITED

AUCKLAND PRISON CAPACITY INCREASE: VOL 2 APPENDIX 2G ARCHAEOLOGICAL ASSESSMENT FINAL

Prepared for Department of Corrections – Ara Poutama Aotearoa
26 March 2026



By
Ellen Cameron, MSc
Jen Low, MA (Hons)

Clough
& ASSOCIATES LTD

321 Forest Hill Rd,
Waiatarua, Auckland 0612
Telephone: (09) 8141946
Mobile [REDACTED]
www.clough.co.nz

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1 INTRODUCTION

1.1 Project Background

1. Department of Corrections – Ara Poutama Aotearoa (**Corrections**) is seeking an alteration to the Auckland Prison Designation 3900 under the Fast-track Approvals Act 2024 (FTAA) to increase the capacity at Auckland Prison. An alteration will also be made to remove the Designation from the Prison Village. The alteration is being sought to enable capacity to be increased from the current Designation limit of 681 to 1,220 prisoners. This increase is to respond to projected population growth and build resilience into the network in an identified region of demand. This increase in capacity will enable new facilities for 960 prisoners to be built, which will operate alongside the existing Maximum Security Facility (which can accommodate 260 maximum security prisoners). The increase in capacity may be built in stages.
2. Auckland Prison is located at 530 Pāremoremo Road, Pāremoremo, Auckland and the legal description is Lot 4 DP 24508, Lot 3 DP 64525, Sect 1 SO 476557, Sect 3 SO 476557, Sect 2 SO 476557 and Pt Allotment 681 Parish of Pāremoremo and 505 Pāremoremo Road (Sec 1 SO 66966). The Prison Village, which will not be included in the amended Designation is located in Pt Allot 681 Parish of Pāremoremo (Figure 1). The entire site is designated for ‘Auckland Prison’ (Auckland Unitary Plan reference 3900) with the Minister of Corrections as the requiring authority.
3. The amended Designation will be referred to as “the Site” in this report. The Site and surrounding land is zoned Rural–Countryside Living Zone under the Auckland Unitary Plan
4. The Old East Division was the original Maximum Security Facility at Auckland Prison and the first complex built at the Site in 1969. Along with the Old East Division facility, 97 houses were built in the Prison Village (shown in Figure 2). In 1981, the West Division, which was built as a medium security facility (now high security), was opened. In 1994, the two low security units, Te Wairere and Te Piriti, opened and a third unit Te Mahunga was added later in the 1990’s. The new Maximum Security Facility was built in 2018 to replace the Old East Division. The former Old East Division facility was closed in 2018, with the maximum security prisoners moving into the new ‘Maximum Security Facility’. The Old East Division buildings remain in place.
5. The Site contains a Maximum Security Facility which is capable of accommodating up to 260 maximum security prisoners, and a number of other existing facilities for low to high security prisoners.
6. The project objectives are as follows:
 1. Provide sufficient prisoner places with the appropriate security classification in the geographical area of need to meet demand.

2. Enable the development of quality and modern fit-for-purpose prison facilities to support the safety of staff and prisoners and enable better delivery of rehabilitation and reintegration programmes.
3. Ensure the prison has the capacity to respond to unexpected events and changing conditions, including operational resilience and disaster reserves and flexibility for future design, operational efficiencies and innovation.
4. Enable the efficient use and development of land held for prison purposes and associated assets.
5. Locate the prison facility capacity sufficiently close and connected to:
 - the culture, community, and whānau of prisoners;
 - a workforce of prison staff to support a safe, secure and effective prison operation; and health services and service providers to rehabilitate and reintegrate prisoners.
6. Significant adverse environmental effects of the development of the Site are appropriately avoided, remedied or mitigated.

1.2 Statement of Qualifications and Relevant Experience

7. This report has been prepared by Ellen Cameron, a Co-Director, Clough & Associates. Ellen's qualifications and experience are outlined in **Appendix C: Expert Summary Statement** along with confirmation that this report has been prepared in accordance with the Environment Court's Code of Conduct for Expert Witnesses.

1.3 Purpose of this Report

8. This archaeological assessment was commissioned by Corrections to establish whether future development of the land within the Site shown on Figure 3 is likely to result in potential effects on archaeological values. This report has been prepared as part of the Substantive Application accompanying a Notice of Requirement under the Fast-track Approvals Act 2024 and to identify any requirements under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA). A separate report will also be prepared to support the archaeological authority application.
9. A set of development parameters have been developed to provide the basis for the assessment of the effects on the environment. The parameters provide for the maximum anticipated 'envelope' of built form and operational characteristics (i.e. prescribed maximum limits) that form the proposal. The Auckland Prison and Prison Village are currently designated in the Auckland Unitary Plan as Designation 3900. The proposed alteration to the Designation will remove the Designation from the Prison Village, while retaining it over the Auckland Prison Site and 505 Pāremoremo Road, which is occupied by a hall. The spatial extent of the Site is shown in Figure 3.

1.4 Methodology

10. The New Zealand Archaeological Association's (NZAA) site record database (ArchSite), Auckland Council's Cultural Heritage Inventory (CHI), Auckland Unitary Plan Operative in Part (AUP OP) schedules and the Heritage New Zealand Pouhere Taonga (Heritage NZ) New Zealand Heritage List/Rārangī Kōrero were searched for information on sites recorded in the vicinity. Literature and archaeological reports relevant to the area were consulted (see Bibliography). Early survey plans and aerial photographs were checked for information relating to past use of the project area. Archival research was carried out to establish the history of the properties included in the current Designation area.
11. A visual inspection and minor subsurface testing with a probe and spade of the undeveloped parts of the Site in areas that were determined to have archaeological potential was conducted on 20 February 2025 (shown in Figure 2). Areas that were found to contain buildings, areas that were shown to have undergone previous earthworks on aerial photographs and areas that were included in previous surveys were not included because these are already modified therefore highly unlikely to contain archaeological features. It is noted that the surveyed areas were for the most part outside of Area A and Area B, largely because areas within Areas A and B are already highly modified and set back from the coast with a lower risk of presence of archaeological features. Planting is proposed in these areas outside of Areas A and B, which has the potential to affect any archaeological sites that are present.
12. The ground surface was examined for evidence of former occupation (in the form of shell midden, depressions, terracing or other unusual formations within the landscape relating to Māori settlement, or indications of 19th century European settlement remains). Exposed and disturbed soils were examined where encountered for evidence of earlier modification, and an understanding of the local stratigraphy. Subsurface testing with a probe and spade was carried out over the property area to determine whether buried archaeological deposits could be identified or establish the nature of possible archaeological features. Particular attention was paid to the spur and ridge lines and stream/creek banks (topographical features where archaeological sites are often found to be located). Sites were photographed and GPS readings taken. Photographs were taken to record the area and its immediate surrounds.

1.5 Parameters Relevant to this Assessment

13. The parameters relevant to the archaeological assessment are presented in Table 1. Ellen Cameron has inputted to the parameters through background research and site survey, assessment of archaeological values and recommendations on the proposed parameters, including identification of Areas A and B where the majority of the Prison facilities will be established, and which are largely confined to areas of the Site that are already modified, meaning previous excavation in these areas would have destroyed any archaeological remains that may have once been present.

Table 1. Parameters relevant to this assessment

Parameter	Purpose (from an archaeological perspective)	Methodology (how the methodology was developed with input from archaeologists)	How the parameter has informed the assessment
<p>New secure facilities must be located in Area A.</p> <p>New non-secure facilities may be located in Areas A or B.</p>	<p>To provide sufficient developable land area, to accommodate the additional demand (new facilities for 960 prisoners) (Area A)</p> <p>To provide certainty of the activities that will occur inside of Areas A and B.</p> <p>To provide appropriate buffers from boundaries and the coast for the secure perimeter and areas where development occurs (for example, setback from the coast where the highest potential for archaeology exists)</p> <p>To enable redevelopment, as required, of areas that are already highly modified across the Site (with lowest potential for archaeological features)</p>	<p>Site-Wide analysis for identification of existing archaeological constraints, i.e. recorded archaeological sites and identification of areas of archaeological potential.</p> <p>Site-Wide identification of areas where previous modifications have occurred.</p> <p>Areas free from these archaeological constraints and already highly modified were considered more suitable for development.</p>	<p>Defined the scope of effects by confirming the types of development/activities that will occur within Area A and Area B (on highly modified land with lower potential for archaeological values)</p> <p>Supported the avoidance of recorded archaeological site R10/831.</p>
<p>Only certain types of non-secure facilities in other areas including, within Area C:</p> <p>a. Landscaping revegetation and tree planting;</p>	<p>To provide for a “balance area”, where secure facilities will not be located, while enabling the continued use of the designated land for the designated purpose (and provision for supporting infrastructure and planting etc).</p>	<p>Site-Wide Constraint Mapping and Suitability Analysis (as above).</p> <p>The balance area (Area C) was identified by mapping and excluding:</p>	<p>Defined the scope of effects by confirming the types of development/activities that will occur outside of Area A and Area B. The assessment could therefore could assume that large-scale earthworks and extensive land disturbance would be unlikely in these</p>

Parameter	Purpose (from an archaeological perspective)	Methodology (how the methodology was developed with input from archaeologists)	How the parameter has informed the assessment
<p>b. Farming</p> <p>c. Surveillance equipment and lighting;</p> <p>c. Vehicle accessways;</p> <p>d. Infrastructure and Services (including water, wastewater and stormwater facilities);</p> <p>e. Cultural buildings;</p> <p>f. Offender employment activity; and</p> <p>g. Energy generation and storage facilities</p> <p>Within Area D, certain types of non-secure facilities including Staff training facilities, community facilities, infrastructure/services, carparking and lighting.</p>	<ul style="list-style-type: none"> To provide certainty of the types of activities that will occur outside of Area A and B. 	<ul style="list-style-type: none"> Secure facility zones (Area A) Non-secure facility zones (Area B) Known archaeological, ecological or physical constraints (e.g., wetlands, streams, steep slopes, the coastline) <p>This left an area where lower-impact activities—many of which already exist—could be located, maintained, or upgraded.</p> <p>Functional Integration and Infrastructure Need - The parameter reflects the need for certain site-wide functions (e.g., stormwater management, roads, infrastructure, farming) to extend across and beyond Areas A and B.</p>	<p>areas where the primary activities expected to occur are farming, planting, infrastructure and the continued operation of the community hall at 505 Pāremoremo Road.</p>

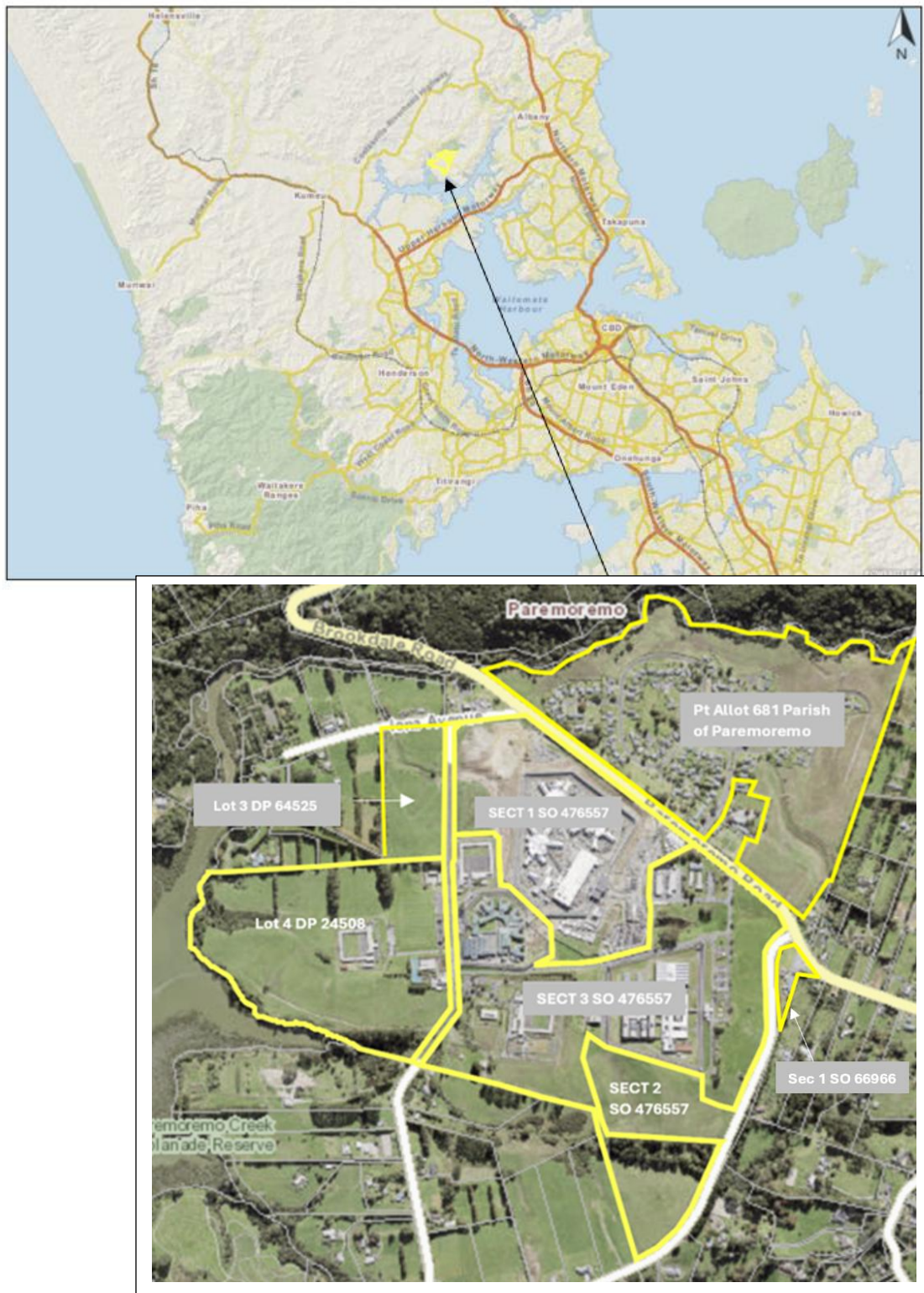


Figure 1. Upper map showing the location of the Auckland Prison Site in the greater Auckland region and lower aerial inset showing the property boundaries in the current Designation 3900 area (source: Auckland Council GeoMaps)

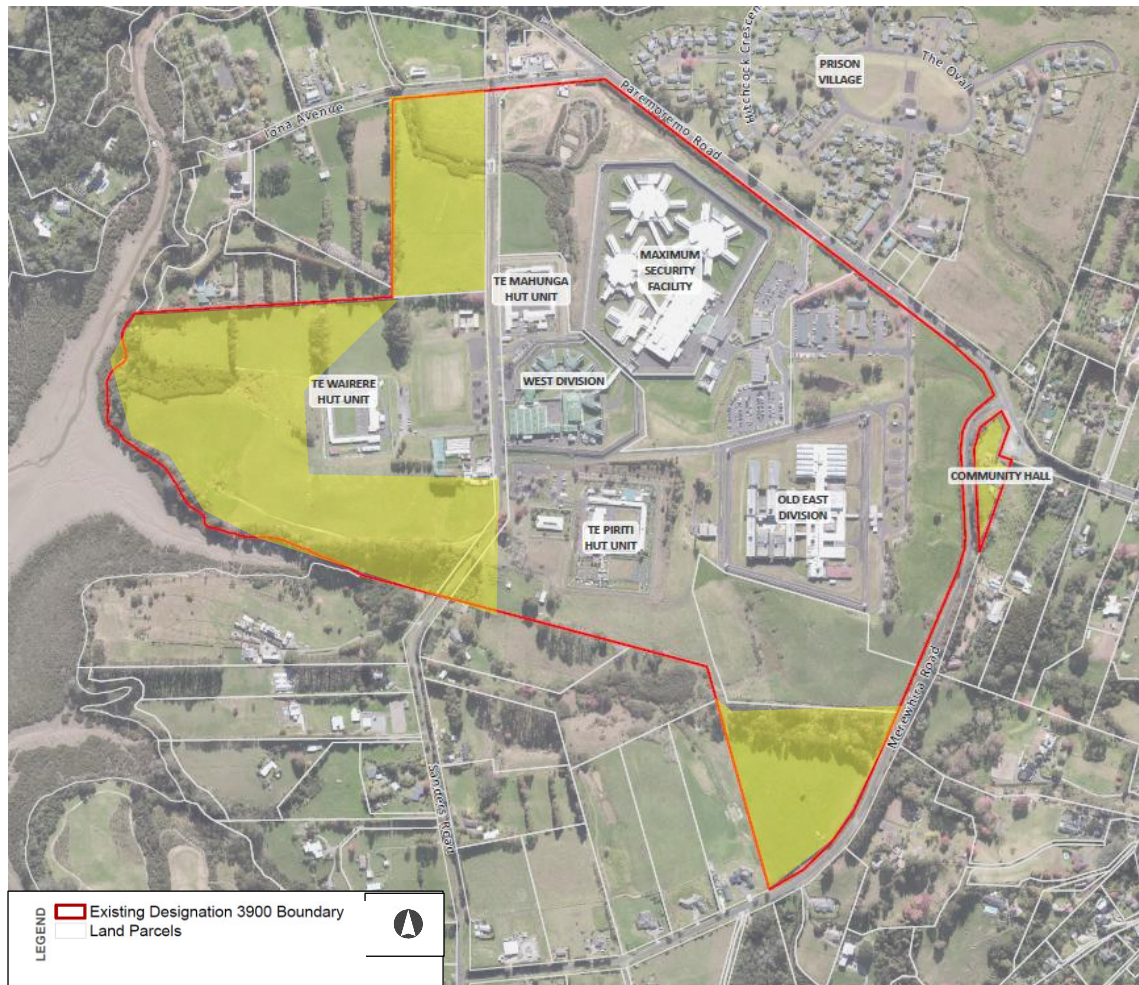


Figure 2. Auckland Prison and Village Site (Existing Designation Boundary 3900 outlined with red line) and areas included in the 2025 survey shaded yellow (source: Boffa Miskell)

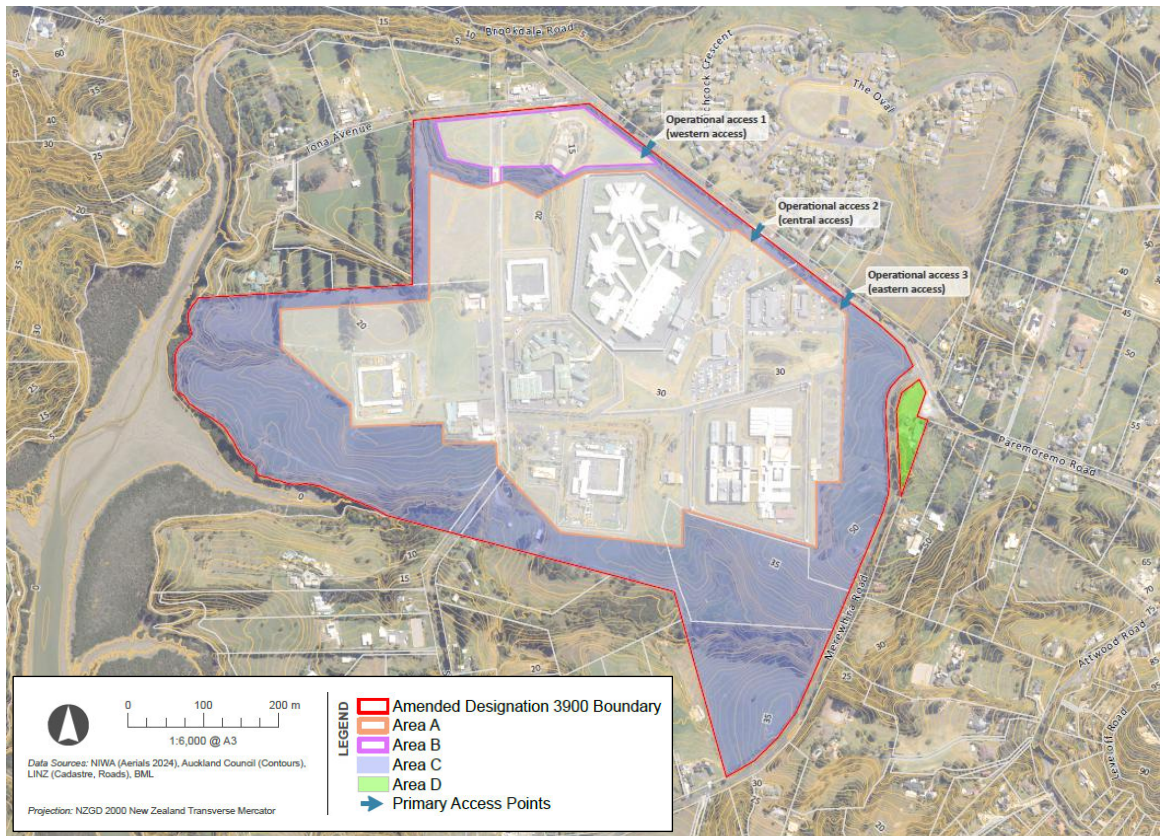


Figure 3. Aerial plan showing the Site with access points on Pāremoremo Road (source: Boffa Miskell)

2 HISTORICAL BACKGROUND¹

2.1 Māori Settlement

14. Tāmaki-makau-rau was a very favourable area for settlement by Māori from the earliest times, with its rich and easily accessible marine resources and its extensive volcanic fields which provided excellent agricultural soils. The distribution of archaeological sites of pre-European date on the Isthmus reflects the general pattern of settlement: shell midden and settlement sites around the coast and along the waterways leading inland; garden areas around the volcanic cones and other inland areas; and defensive settlement on higher points and particularly concentrated on the volcanic cones themselves. These catchments combined access to marine resources, agricultural soils, fresh water and communication routes via harbours, waterways and overland.
15. The Riverhead, Pāremoremo, Greenhithe area, Te Atatu, West Harbour and other locations along the creeks and inlets of the inner reaches of the Waitematā Harbour, were occupied by Māori for generations before the arrival of Europeans, evidence of which survives in the form of recorded place names, oral traditions and archaeological sites (although many have been destroyed by 19th and 20th century development and natural processes). Lucas Creek, known to Māori as Kaipatiki (Madden 1966) provided a feeding ground to flatfish. Additionally, a number of shellfish species inhabited the creek, and bird life would have been abundant in the forests, all providing a rich source of protein.
16. A number of Māori place names were recorded by L.G. Kelly in 1929 in the Auckland region, including at Pāremoremo as shown in Figure 4 (Simmons 1980). These include Te Uru Kowhai, a headland on the east side of Pāremoremo Creek, Te Ara Huri Haere, a Māori track that would have crossed the property in the past and Te Pā Tuna Pi, that was located at the turn of the creek to the west of the Auckland Prison Site.

2.2 European Settlement

17. The Mahurangi purchase by the Crown took place in 1841. The area contained vast swathes of forest, and a thriving timber industry soon emerged to satisfy the demand for construction materials for building at Auckland. At Pāremoremo, the principal early Pakeha land holders were the Sheehan family to the west of Pāremoremo Creek, and John and Mary Faire to the east of the Creek. Timber operations at Pāremoremo reached their peak in the period 1841-1846 (Madden 1966:45), and timber in the area was largely cut out by 1857, with timber operations moving northwards to what are now the Albany, Wairau Valley and Northcote areas of the North Shore. The upper harbour stations became the haunts of runaway sailors, convicts and military deserters who worked as timbermen and sawyers (*ibid.*).

¹ This section is adapted from Bickler and Clough 2014 and Felgate 2013.



Figure 5. Detail from map titled 'Waitematā River from Kauri Point Auckland Harbour to its sources, surveyed by Comr. B. Drury and the officers of H.M.S. Pandora 1854', with the current Designation area described as 'Undulating Fern Land' indicated by arrow (source: Auckland Libraries Heritage Collections Map 3909)

3 HISTORICAL SURVEY

3.1 Information from Early Maps, Plans and Archival Research

20. Early maps and plans were reviewed along with archival research to gather information on the past ownership and land use in The Site. For an overall view, the properties containing the Prison Site (to the southwest of Pāremoremo Road) and the property containing the Prison Village Site to the northeast of Pāremoremo Road) have been included in the historical background.
21. OLC 329, surveyed in 1846, was the earliest relevant map of the area, and showed the land on which the Auckland Prison sits belonging to Mrs Mary Faire (Figure 6). John and Mary Faire were involved in timber operations at Pāremoremo from some time before 1844 and secured a waiver of the Crown's right to pre-emption of Māori Land purchases, purchasing 800 acres from Ngāti Whātua. John Faire was involved in logging, lumber sawing and cattle grazing at Pāremoremo when he was drowned. His widow Mary Faire continued to farm and cut timber, and subsequently married Maurice Kelly, who became the major timber operator in the area.
22. The plan dated 1848 in Figure 7 shows the current Designation area in part of Allotment 8 and has the annotation 'M. Kelly' on Allotment 8. However, in 1849, Mary Faire conveyed 500 acres of Allotment 8 Parish of Pāremoremo to the Crown in exchange for Allotment 11 Parish of Pāremoremo (DR 1D/220, Archives NZ). On 2 May 1873 Mary and Maurice Kelly conveyed several pieces of land to themselves and Walter Lee, of Auckland, surgeon, as Trustee (DR 28D/447, Archives NZ). It would seem that Kelly repurchased Allotment 8 at some point, as on 13 May 1880 Kelly conveyed Allotment 8 to James Wallis of Auckland, gentleman, for the sum of £204 (DR 32D/881, Archives NZ). On 12 March 1896, 408 acres of Allotment 8 was conveyed to Adrian Edgar Richards and Eugene Richards of Auckland, settlers, for the sum of £850 (DR R51/429, Archives NZ).
23. The 1922 map in Figure 8 shows planned roads in the area including through Allotment 8 and Allotment 109, which established Pāremoremo Road and Sanders Road. The plan has the name 'Richards' annotated on part of Allotment 8 and 'E.C. Dennis' on Allotment 109.
24. The 1930 plan in Figure 9 shows the subdivision of parts of Allotment 8 with the Site being located in lots 3, 4, 5 7 to the west of Pāremoremo Road and Lot 2 to the northeast of Pāremoremo Road (the Prison Village). The area to the southwest of Pāremoremo Road also includes part of Allotment 109. The properties are described as 'Grass and Small Scrub Land' and there are four streams shown, one running through what is now Sec 1 SO 476557 through the central part of The Site, one in the southern part of The Site, one running across the central part of the Prison Village and one along the northern boundary of the Prison Village. No buildings are shown on any of the plans discussed above.

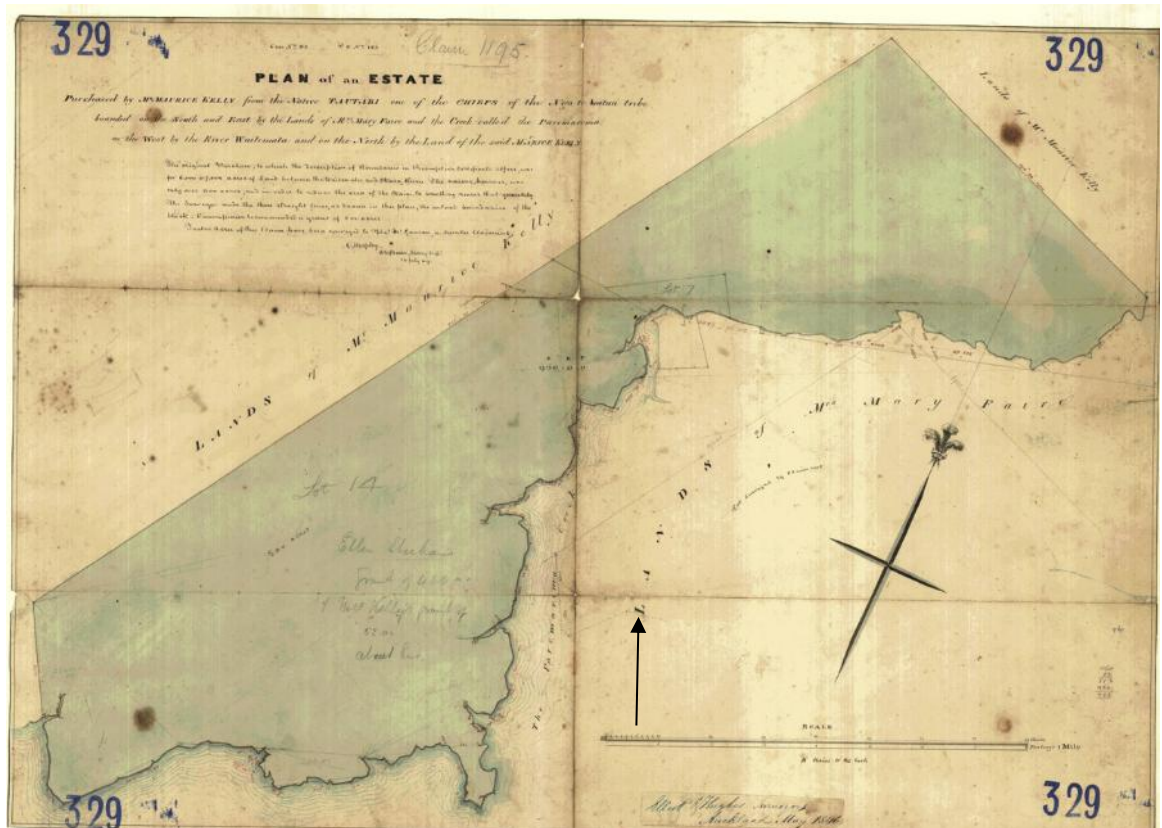


Figure 6. OLC 329 plan dated 1846 showing the land to the east of Pāremoremo Creek annotated as 'Lands of Mrs. Mary Faire' (indicated by arrow) (source: Quickmap)



Figure 7. AK SO 717 plan from an 1848 survey showing the land to the east of Pāremoremo Creek owned by M. Kelly, including the Auckland Prison Site (source: Quickmap)



Figure 8. AK SO 22303 plan dated 1922 with the property containing the Auckland Prison Site described as 'Undulating Country' and with the names 'Richards' and 'Reilly' annotated as the owners (source: Quickmap)

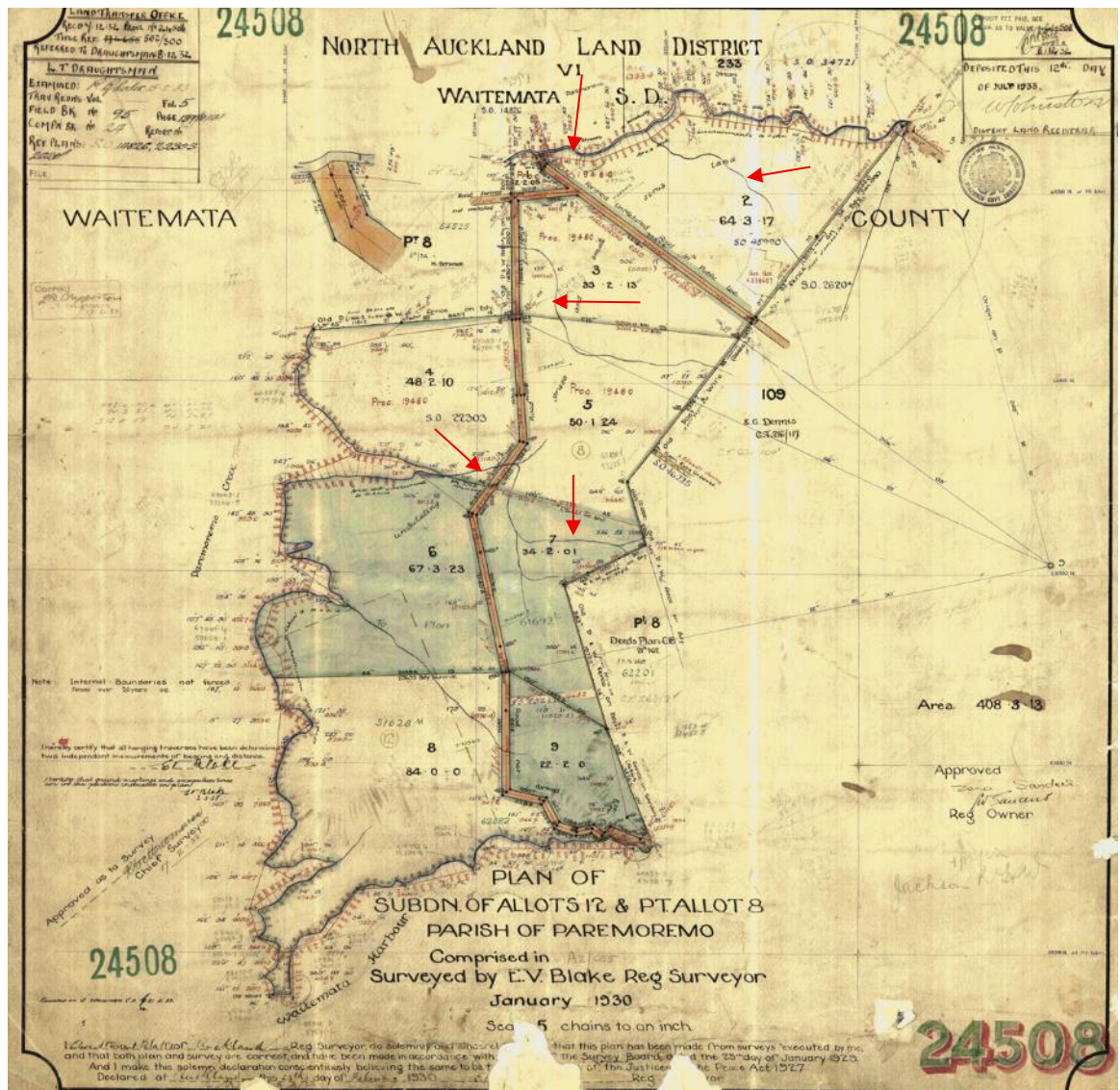


Figure 9. AK DP 24508 dated 1930 showing a subdivision including The Site, now contained in lots 3, 4, 5 and 7 DP 24508 and in part of Allotment 109 and the Prison Village in Lot 2 with streams indicated by arrows (source: Quickmap)

4 ARCHAEOLOGICAL BACKGROUND

4.1 Recorded Archaeological Sites

25. There is one recorded archaeological site within the current Designation 3900 boundary (R10/831) and 11 additional sites in the vicinity outside of the current Designation boundary (within c.700m). These are shown in Figure 10, with a brief description provided in Table 1. The recorded archaeological site within the Designation boundary, is R10/831 (CHI:11184) a shell midden located on a possible terrace cut into the bank along the western coastal boundary of The Site. The Site was noted to contain crushed cockle, identified through probing and a test pit (see **Appendix A** for site record form (SRF)).
26. The majority of the 11 archaeological sites in the vicinity but outside of the current Designation 3900 area are also shell middens, the main exception being R10/163, which is the site of a Māori village (kāinga), Te Marae o Hinekakea. It is located to the north and west of the Auckland Prison Site on a large flat piece of land near a bend in Pāremoremo Creek with a minimum distance to the Prison boundary of c.370m. Identified archaeological remains include midden and oven stones in darkened soil near the shoreline. As well, historic ceramics and glass have been found. The archaeological site also includes the grave of Manhi Hapi, who was the brother-in-law of George Graham, who owned the property containing the Site from 1908 to 1932. Graham was an ethnographer who recorded Māori place names in Auckland as well as a lawyer who wrote articles on Māori subjects. The archaeological site is also included in Schedule 14.1 Schedule of Historic Heritage in the AUP OP ID: 0729 and in the Auckland Council CHI (ref:7103).
27. Sites R10/886 and R10/887 are both recorded as shell middens and R10/886 also with a possible terrace cut into the creek bank. They are located to the south of R10/163 along the edge of Pāremoremo Creek in the Pāremoremo Creek Esplanade Reserve. R10/886 was found to contain a small amount of crushed shell and fire cracked rock on a possible terrace c.4 x 3m in size on a small point of land jutting out above the creek. R10/887 is a shell midden located just to the north of the Prison Site at the mouth of an ephemeral stream which feeds into a small tidal inlet of Pāremoremo Creek. Crushed shell, charcoal and fire cracked rocks were identified. The SRFs also note that both sites would have been easily accessed by canoe. The sites are also included in the CHI – refs:11238 and ref:11239, respectively.
28. R10/1475 and R10/1476 are both shell middens recorded along the opposite side of the stream bordering the northern part of the Prison Village. R10/1475 is recorded as traces of cockle midden situated c.20m up slope of the stream. R10/1476 is located to the west of site R10/1475 along the same stream and is also described as traces of cockle midden exposed over 2m along the edge of a walking track about 8m above the stream. The sites are also included on the CHI – refs: 22841 and 22842, respectively.
29. Site records from NZAA ArchSite indicate that survey for a gas pipeline on the eastern side of the Pāremoremo Creek was undertaken and several midden sites were identified in 1996 by Jeff Mosen of Bioresearches. The SRFs, however, only provide

a GPS location with no description or other information and as such the exact locations and extents remain unknown. These sites are R10/1200 (CHI:17809), R10/1201 (CHI:17810) and R10/1202 (CHI:17812). As well, the SRFs for sites R10/1168 (CHI:17711), R10/1169 (CHI:17712) and R10/1199 (CHI:17808) also only provide a GPS location with no details or information on when they were recorded.

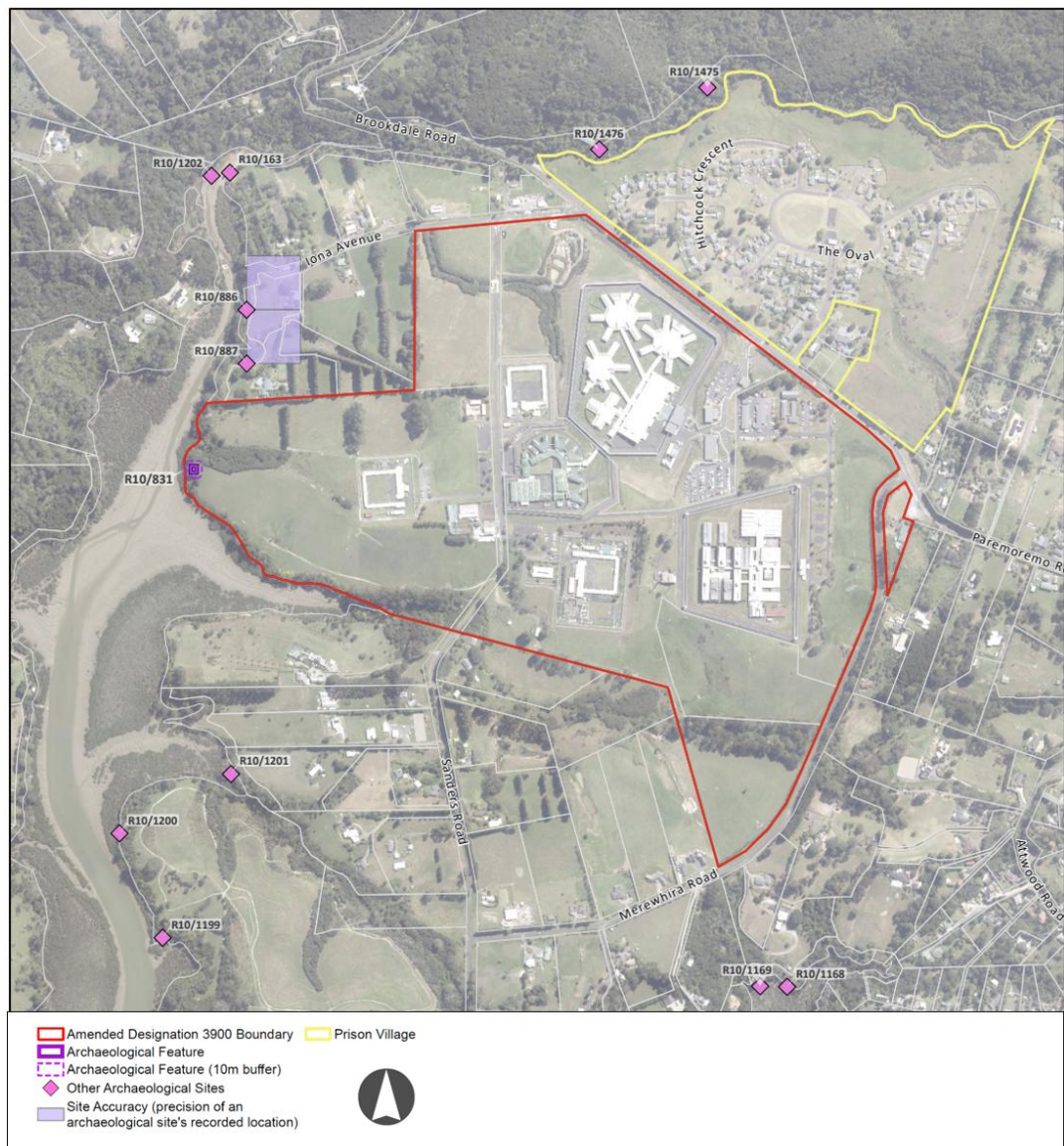


Figure 10. Map showing the locations of the recorded archaeological sites within and in the vicinity (within c.700m) of the current Designation 3900 area (source: NZAA Archsite Website)

4.2 Other Historic Heritage Sites

30. All of the above archaeological sites are also included on the Auckland Council Cultural Heritage Inventory (CHI) along with one additional site. This is CHI: 17811, which is a maritime site recorded as a landing on Pāremoremo Creek. It is located along the eastern side of the creek, c.170m to the north of the current Designation area. The location of the landing is shown in Figure 11 and a brief description is included in Table 1. It should be noted that site R10/831 is incorrectly located on the map in Figure 11 because of an administrative error.

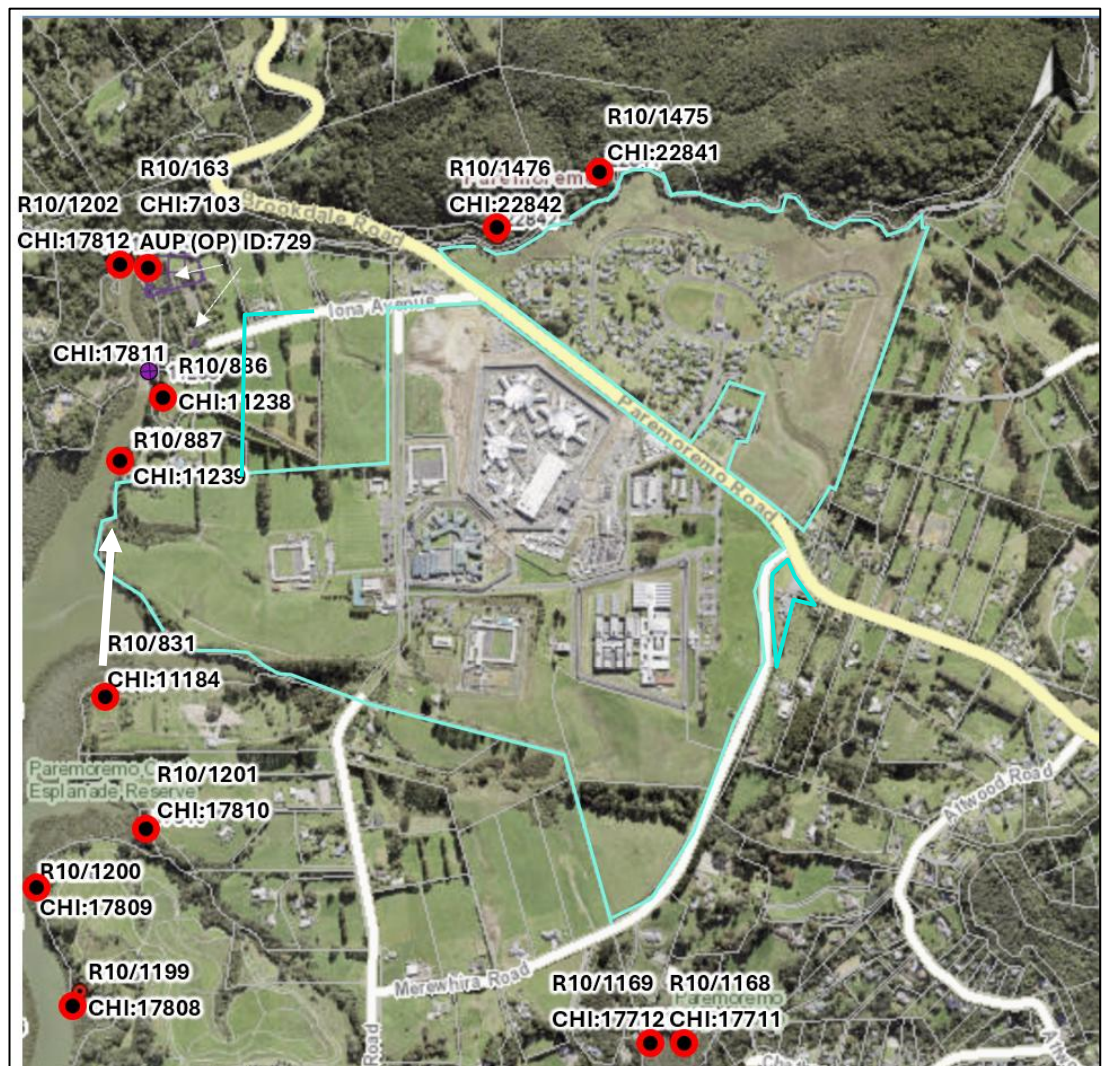


Figure 11. Aerial plan showing the locations of the recorded archaeological sites in the vicinity of the Designation 3900 area – note the location of R10/831 is incorrectly located on this map with correct location shown in Figure 10 and indicated by the white arrow (source: Auckland Council GeoMaps)

Table 2. Brief description of the recorded archaeological and historic heritage sites within and in the vicinity (within c.700m) of the Designation 3900 area with site located within the current Designation boundary shaded grey

NZAA Ref	CHI Ref (AUP (OP) ref)	Site Type	Description	NZTM Easting	NZTM Northing
R10/163	7103 0729 (Cat B)	Site of Māori Village and Grave	Te Marae o Hinekakea Village Site Grave of Manahi Hapi	1746013 1746112	5931333 5931171
R10/831	11184	Pit/ Terrace	A west facing terrace above creek bank (10m long and 5m wide cut into the bank) midden present	1745945	5930478
R10/886	11238	Pit/ Terrace	Possible terrace (4 x 3m) with small amount of crushed shell visible	1746044	5931078
R10/887	11239	Midden/ Oven	Small amount of crushed shell, charcoal and fire cracked rock noted.	1746044	5930978
R10/1168	17711	Midden/ Oven	No information available	1747048	5929821
R10/1169	17712	Midden/ Oven	No information available.	1746998	5929822
R10/1199	17808	Midden/ Oven	No information available	1745888	5929912
R10/1200	17809	Midden/ Oven	No information available	1745808	5930106
R10/1201	17810	Midden/ Oven	No information available	1746015	5930216
R10/1202	17812	Midden/ Oven	No information available	1745979	5931327
R10/1475	22841	Midden/ Oven	Traces of cockle midden with fire cracked rock	1746900	5931491
R10/1476	22842	Midden/ Oven	Traces of a cockle midden exposed over a 2m area	1746699	5931376
n/a	17811	Maritime Site	Landing	1746022	5931115

5 PHYSICAL ENVIRONMENT

5.1 Topography, Vegetation and Landuse

31. The Auckland Prison Site is located near the Pāremoremo Creek in the upper Waitemata Harbour. Soils are heavy clay and ground coverage consists of pasture for cattle. There are residential and other buildings to the northeast of Pāremoremo Road. The streams in the current Designation 3900 area are shown in Figure 12. The aerial plan with contours in Figure 13 shows that the Designation area to the northeast of Pāremoremo Road is fairly flat at an elevation of 40m asl apart from the areas bordering streams and an area in the central part which has been modified for housing. The area to the southwest of Pāremoremo Road shows a more undulating landscape with steep hillsides in the southeastern part. It also shows steep banks leading down to Pāremoremo Creek along the western side and to an inlet of the creek along the southwestern boundary.

5.2 Previous Modifications

32. The parts of the existing Designation 3900 area containing the Auckland Prison Site and the Prison Village have been earthworked since the building of the original Prison in the late 1960s and there have been substantial earthworks since then for new infrastructure. Aerial photographs were reviewed to identify the areas which have been modified in the past. The aerial photograph in Figure 14 from 1963 shows the current Designation 3900 area prior to the Prison construction. As can be seen the property contains a farmhouse and outbuildings alongside a stream and bordered by trees to the southwest of Pāremoremo Road. There are also a few scattered farm buildings to the south. There are no structures shown in the Prison Village area to the northeast of Pāremoremo Road. Stream courses and farm tracks can be seen to be present in this area with grassed paddocks and some areas of cultivation.

33. The 1968 aerial photograph in Figure 15 shows the works for the Prison facility to the southwest of Pāremoremo Road as it existed at that time. The farmhouse and outbuildings to the southwest of Pāremoremo Road are still present at this time. To the northeast of Pāremoremo Road the western part of the Prison Village can also be seen to have been constructed. By 1973 (Figure 16) the village and some prison facilities are completed, although the farmhouse and its curtilage appear unmodified. There is also a building present to the west of Sanders Road near the junction of Iona Avenue in Lot 3 DP 64525. The 1988 aerial photograph in Figure 17 shows that additional prison facilities have been constructed to the southwest of Pāremoremo Road and the Prison Village housing to the northeast of Pāremoremo Road has also been expanded. The aerial photograph dated 1997 in Figure 18 also shows the expanded prison facilities and that some of the paddocks in the western side of the area to the southwest of Pāremoremo Road are under cultivation. Finally, the aerial photographs in Figure 19 dated 2015 and 2017 show the earthworks undertaken for the development of the new Maximum Security Facility in the northern part of the property to the southwest of Pāremoremo Road.

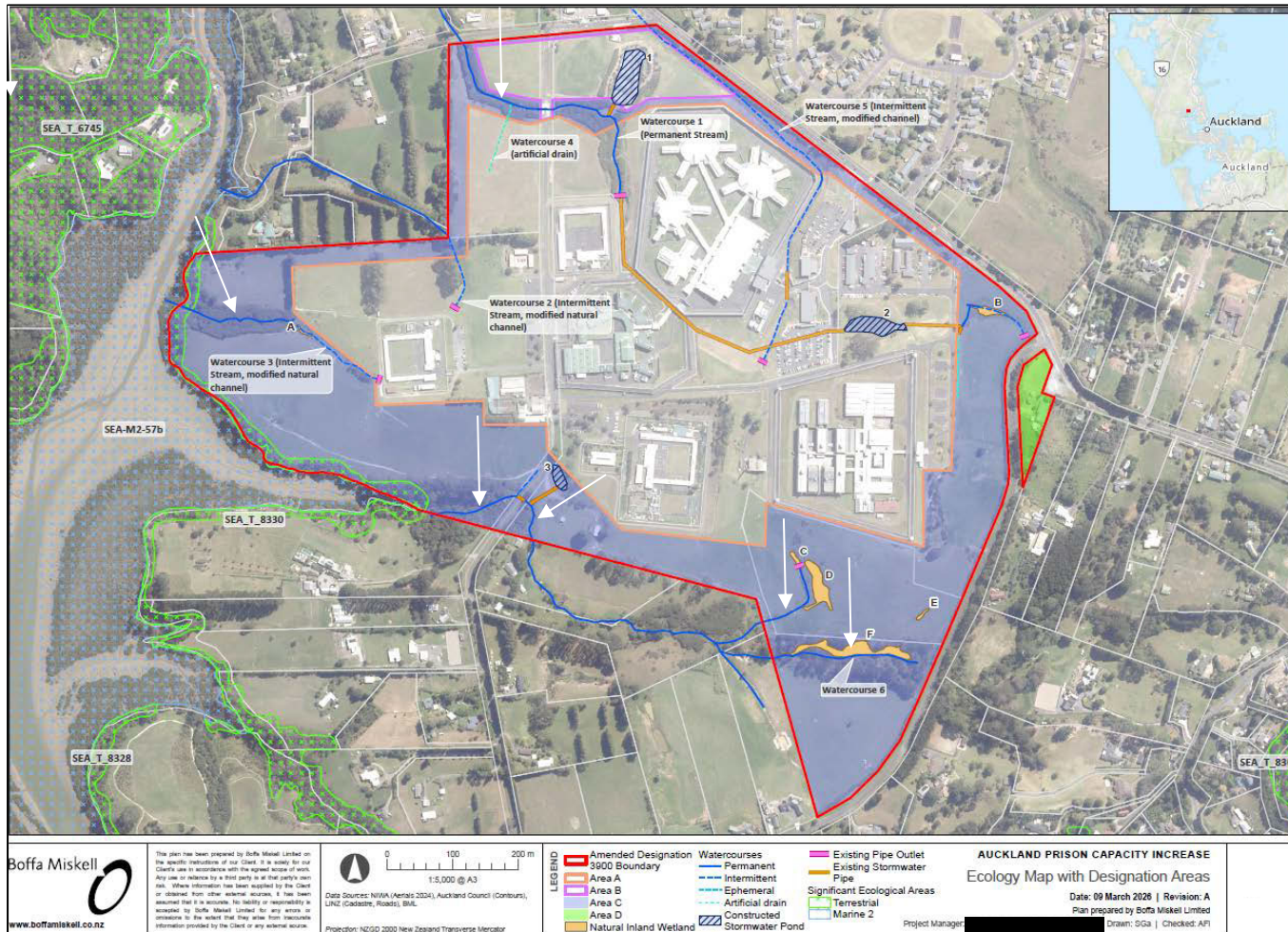


Figure 12. Ecology map showing streams (blue lines) in the current Designation 3900 area, indicated by arrows (source: Boffa Miskell)



Figure 13. Upper aerial plan with contours showing the Site to the southwest of Pāremoremo Road and lower aerial plan showing the current Designation area to the northeast of Pāremoremo Road- the Prison Village which will be removed from the Designation extent (source: Auckland Council GeoMaps)

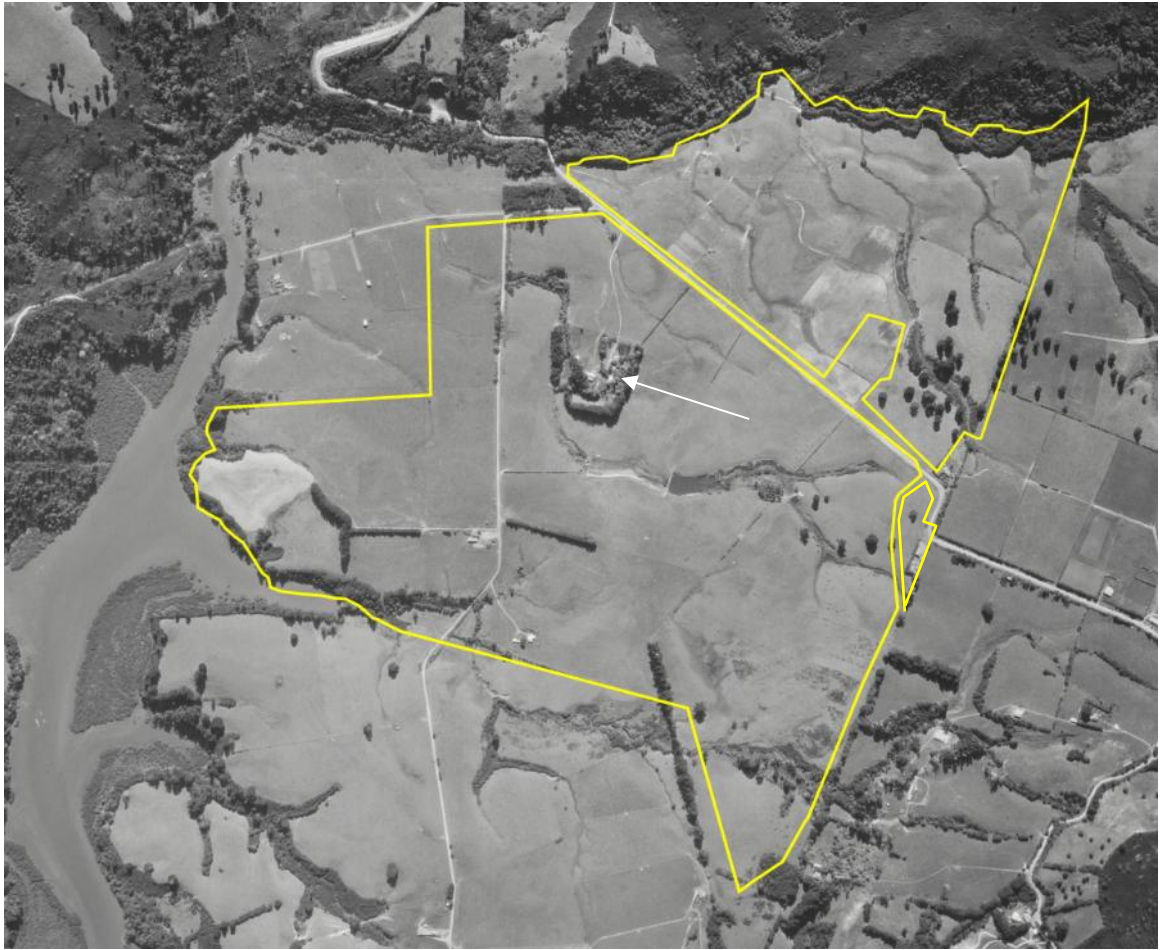


Figure 14. Aerial photograph dated 1963 (Crown 1392 3229 32) showing the current Designation 3900 area outlined in yellow and with the farmhouse alongside the stream to the southwest of Pāremoremo Road indicated by arrow (sourced from: [http:// retrolens.nz](http://retrolens.nz) and licensed by LINZ CC-BY 3.0)



Figure 15. Aerial photograph dated 1968 (Crown 1875 5043 14) showing the works for the Prison in the western part of the Site to the southwest of Pāremoremo Road (indicated by arrow) (sourced from: [http:// retrolens.nz](http://retrolens.nz) and licensed by LINZ CC-BY 3.0)



Figure 16. Aerial photograph dated 1973 (Crown 3618 4649 6) showing the current Designation area outlined in yellow with the area to the southwest of Pāremoremo Road showing evidence of cultivation activities in the western part and a building now present in Lot 3 DP 64525 (indicated by arrow) and with the Prison Village constructed to the northeast of Pāremoremo Road (sourced from: <http://retrolens.nz> and licensed by LINZ CC-BY 3.0)

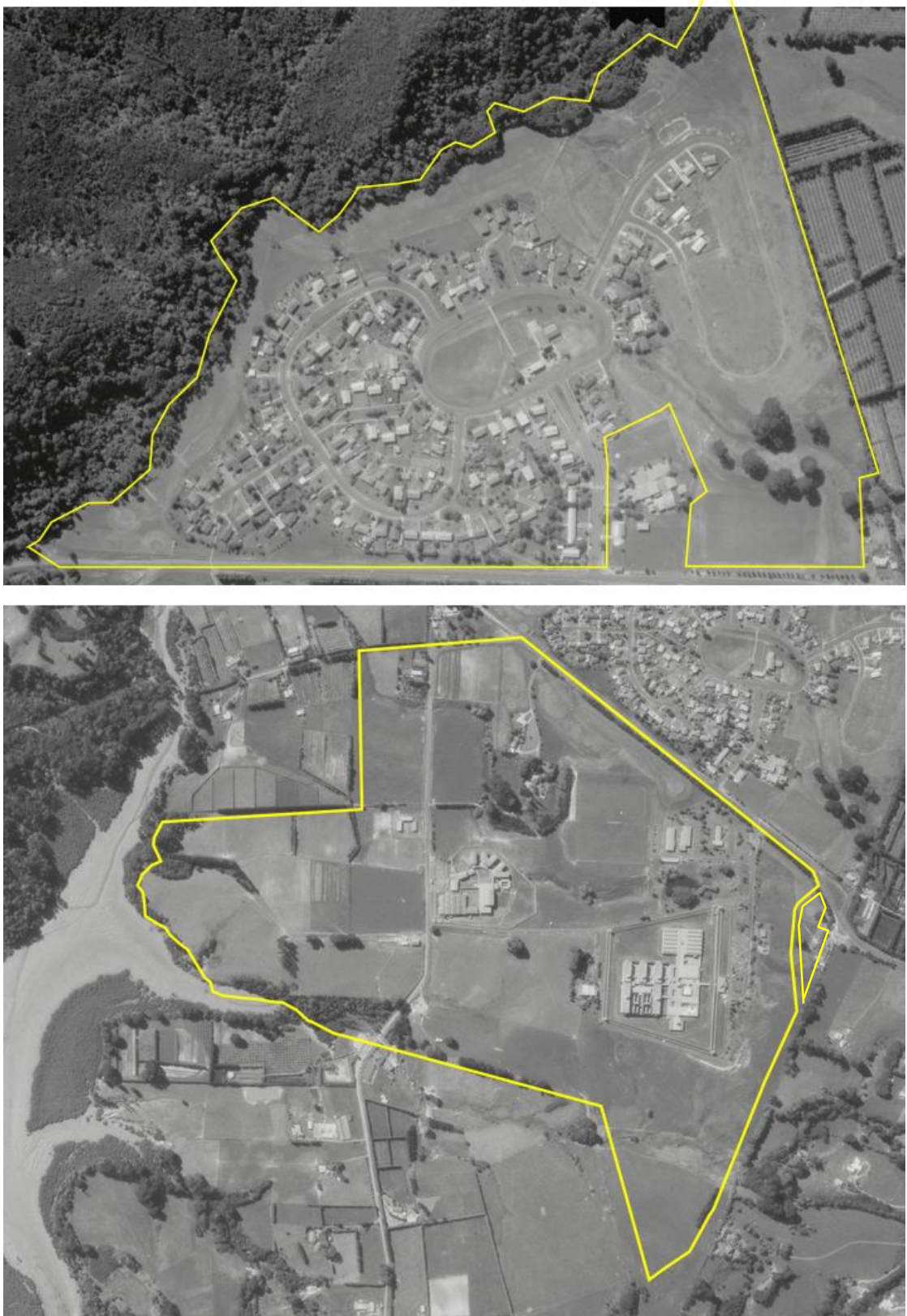


Figure 17. Aerial photographs dated 1988 (Crown 8772 G 10) showing the current Designation 3900 area outlined in yellow with additional prison structures present to the southwest of Pāremoremo Road and the Prison Village extended to its current form (sourced from: [http:// retrolens.nz](http://retrolens.nz) and licensed by LINZ CC-BY 3.0)



Figure 18. Aerial oblique photograph dated 1997 showing areas of cultivation visible in Lot 3 DP 64525 (red arrow) and in the western area near Pāremoremo Creek in Lot 4 DP 24508 (yellow arrows) (source: Google Earth)



Figure 19. Upper oblique aerial photograph dated 2015 and lower aerial photograph dated 2017 showing the northern part of the Site to the southwest of Pāremoremo Road with earthworks visible, including along the stream (source: Google Earth)

6 FIELD ASSESSMENT

6.1 Field Survey Results

34. Two surveys have been previously undertaken for expansion of Prison facilities to the southwest of Pāremoremo Road, one in 2013 and one in 2014. A survey was also undertaken for the current assessment. The results of the earlier two surveys are summarised below for reference and the detailed survey information for the current survey is also provided below. The surveys for the current assessment included the undeveloped areas to the southwest of Pāremoremo Road and the property containing the Community Hall. The areas surveyed included the undeveloped parts of the Site. Areas that were found to contain buildings, areas that were shown to have undergone previous earthworks on aerial photographs and areas that were included in previous surveys were not included because these are already modified therefore highly unlikely to contain archaeological features. It is noted that the surveyed areas were for the most part outside of Area A and Area B, largely because areas within Areas A and B are already highly modified and set back from the coast with a lower risk of presence of archaeological features. Planting is proposed in the Area C, which has the potential to affect any archaeological sites that are present.
35. The area to the northeast containing the Prison Village was not surveyed for this assessment, on the basis that the proposed Designation alteration will remove the Designation from this area.

6.1.1 Results of the 2013 Archaeological Survey

36. The survey consisted of a site walkover which was carried out in April 2013 (Felgate 2013) with the general area covered by the survey shown in Figure 20. The survey attempted to identify and concentrate on relatively unmodified areas as it was noted that some areas were modified in the form of cut works for terracing that had occurred for the construction of the older Prison facilities. It was also noted that the ground was very dry during the survey which hindered probing; however, it was noted that there was minimal grass cover and that pugging by cattle had exposed the upper soil levels, so that if shell midden was present, it would likely have been visible. Some fragments of shell mixed in with modern building debris were identified in a previously disturbed area (labelled 10 in Figure 20) which was not deemed to be archaeological in nature.
37. No archaeological features or deposits were identified during the survey in the proposed development area covered by the assessment and site R10/831 was not able to be relocated.



Figure 20. Aerial plan showing the areas that were photographed during the 2013 survey (source: Felgate 2013:16)

6.1.2 Results of the 2014 Archaeological Survey

38. An archaeological survey was undertaken in July 2014 of the area shown in Figure 21. Probing and test pitting was undertaken; however, it was quickly noted that the top 50cm of soil in much of the proposed construction zone had been modified by previous earthworks. The typical soil profile showed clay and topsoil mixed together with gravel and other debris present in exposed soil. No archaeological features or deposits were identified during the survey (Bickler and Clough 2014: 14)



Figure 21. Aerial plan showing the assessment area that was included in the 2014 survey (Auckland GIS Viewer)

6.1.3 Results of the 2025 Archaeological Survey

39. The survey of Areas 1, 2 and 3 carried out at Auckland Prison for the current assessment was undertaken on 20 February 2025 by Jen Low and Kirstin Roth under clear, dry conditions and for Area 4 on 25 August 2025 by Ellen Cameron also under clear, dry conditions. The survey area covered undeveloped areas in the Site that were found not to have undergone previous modifications from earthworks based on the review of aerial photographs and previous survey details, thereby having higher potential for archaeology features. Modified areas not shown in yellow shading in Figure 22 did not require archaeological survey as there was low potential for archaeological features due to previous excavation activities. Four areas were surveyed (Figure 22), with Area 2 having a frontage to the Pāremoremo Creek. Area 1 was bisected in the northern part of the area by a watercourse (artificial drain) leading to a culvert underneath Iona Avenue. Area 3 is located on the southeastern edge of the Site on Merewhira Road and has a permanent watercourse passing through the northern portion. Area 4 currently contains a community hall. Eight test pits were undertaken (also shown in Figure 22), seven to determine the nature of the subsoils and one (TP2) to confirm the location of a previously identified archaeological site (R10/831).
40. Reference to the watercourses discussed in this section are shown in the ecology map in Figure 23.

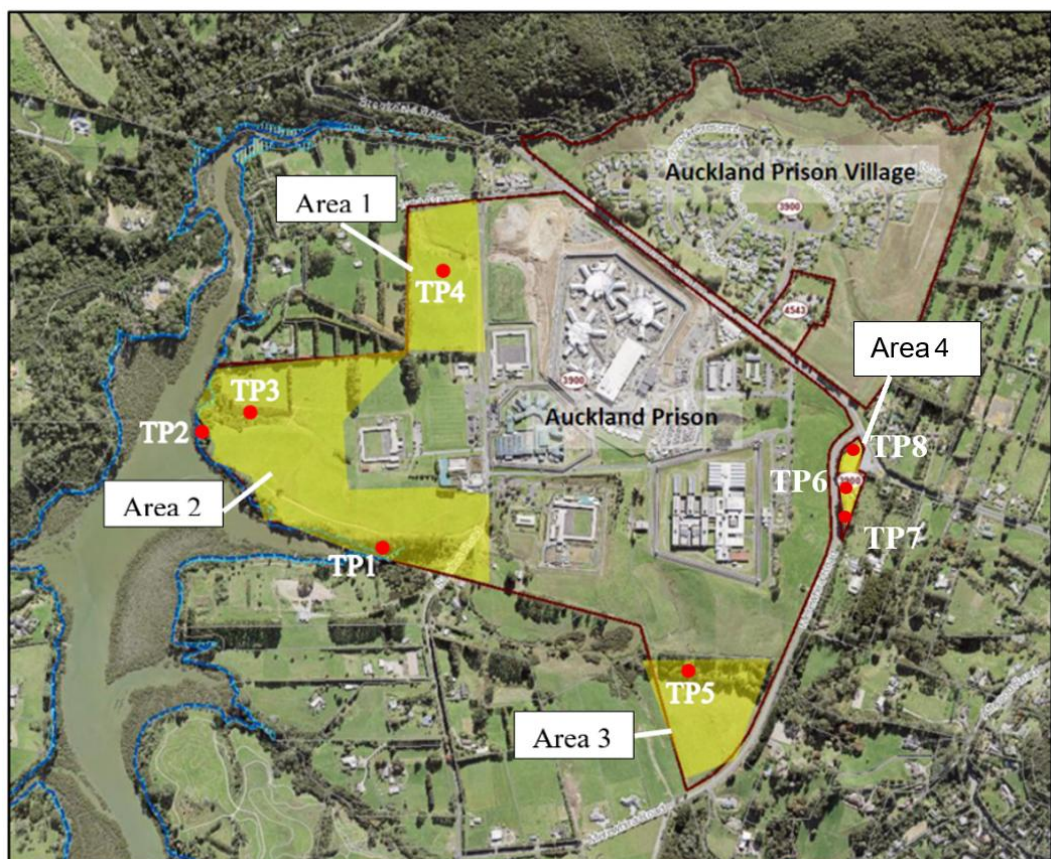


Figure 22. Aerial plan showing the areas surveyed in 2025 shaded yellow with test pits numbered (source: Boffa Miskell)

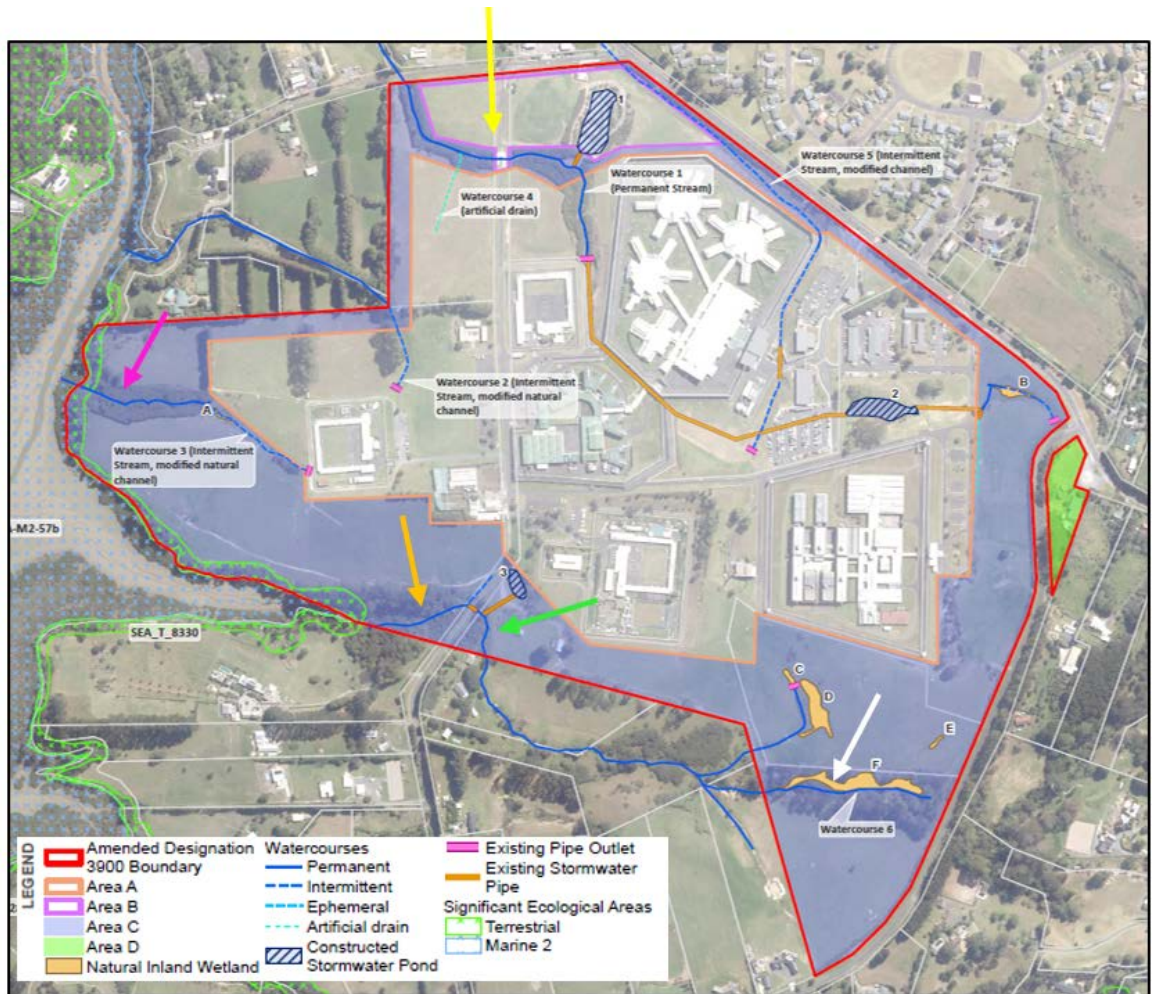


Figure 23. Ecology map showing the watercourse locations in the Site with coloured arrows indicating those referenced in this section (source: Boffa Miskell)

Area 1

41. Area 1 was separated into three paddocks, accessed from the northeast corner of Area 2 northwards to Iona Avenue (Figure 24) and was in use for grazing cattle. The first paddock was relatively flat at the southern end, sloping down towards the north. There were no visible archaeological features, and probing did not detect any subsurface material. The central paddock was reasonably flat in grass and bisected by a permanent stream (indicated by yellow arrow in Figure 23), c.5m wide at the top and running towards the northeast into the northernmost paddock bordering Iona Avenue (Figure 25). The paddocks consisted of hard compacted topsoil and clay. Probing did not detect any archaeological features. A test pit (TP4) measuring 20cm x 20cm was dug to the west of the artificial drain. The topsoil was very compact, having a depth of 7cm, overlying a 6cm layer of silty light brown loam, which in turn overlay an orange-grey clay (Figure 26). No archaeological material was present.
42. Vegetation was present along the northern boundary of the central paddock with post and wire fencing. For approximately 30m on the northern side, there was an area generally fenced off from cattle on both sides, with the artificial drain passing through from Sanders Road westwards before turning towards the northwest and passing beneath Iona Avenue. The paddock was in grass and used for grazing. No archaeological features were identified in this area.



Figure 24. Panorama image looking northeast with Sanders Road right to centre of image. Image taken from southern end entrance from Area 2



Figure 25. Looking north over the central paddock in Area 1 showing the open drainage channel (arrowed red) and approximate location of TP4 (yellow dot)



Figure 26. Photograph showing the detail of test pit 4 (TP4) in Area 1

Area 2

43. Area 2 was the first area to be surveyed, as it was thought this area had the highest chance of archaeological sites being present due to waterway access and known presence of sites elsewhere along the Pāremoremo Creek. The southeasternmost corner of Area 2 was bisected by a closed portion of Sanders Road (Figure 27). A permanent stream (indicated by green arrow in Figure 23) runs through this area leading to an inlet of Pāremoremo Creek) and the banks are bush clad. No archaeological features were identified in the southeastern corner.
44. The main part of Area 2 was divided into paddocks. The area was entered via a farm track off the closed portion of Sanders Road. The track leading into the area is cut below the surface, exposing the stratigraphy on the northern side of the track cut (Figure 28). The stratigraphy consisted of 20-30cm of light grey topsoil overlying light yellow-orange clay. The variability in topsoil depths is likely due to previous ploughing. The first paddock lies between the track and a workshop area, having a moderately steep slope. The adjoining paddock was also moderately sloped before opening on to a relatively flattish area at the top (Figure 29). Part of this area overlooks a Prison unit and was not photographed. Both paddocks are in grass but had been grazed in the recent past. No visible archaeological features were noted, and probing did not detect any subsurface remains.
45. There is an esplanade area with large pines on a flattish terrace-like area in the southeastern part of area 2 leading down to a permanent stream (indicated by orange

arrow in Figure 23). The terrace extended around 10-35m from the fenceline towards the stream. The vegetation along the stream banks was variable, with pine trees particularly on the terrace near the fence line with some gorse present. Vegetation near the stream consisted of ferns, ponga and karamu (Figure 30). There was a small patch of ginger on the southern end of Area 2. The southwestern end of the pine trees appeared to have been intentionally planted, as there were clearly two rows of trees, extending east to west running parallel to the fenceline. The terrace had a slight slope towards the stream, with a steeper slope roughly a metre wide before meeting a second narrow terrace/platform, from which there was a steep drop between 0.5m-1.5m drop to the stream. The southeastern end of the stream had a rock waterfall.

46. A test pit (TP1) was inserted on a slightly sloping terrace c.35m from the fenceline and c.15m from the stream within an area with a light grass cover. The stratigraphy of the test pit showed 5cm of brown moderate to firm topsoil, over 12cm of light greyish-brown mottled clay with occasional dark brown and orange clay inclusions of mixed particle size, overlying yellow clay of firm compaction with some orange clay inclusions (Figure 31).
47. A flattish terrace-like area containing gum trees and pines on the south side of the fenceline was inspected; however, probing did not detect any shell. A terrace near the base of the slope measured c.0.55m with a length of c.30m. This is likely the result of a slump. The third paddock has had trees at the highest point removed in the past. There was a knoll by a flat area adjacent to a Prison unit, with a steep slope to the rest of the paddock. The area was in grass of medium length. There was a somewhat undulating landscape leading into a fourth paddock. The area to the right of the farm track had been cultivated in the past. From the fenceline to an inlet of Pāremoremo Creek was more grassland, c.15-20m in width with ti-tree, gorse and more recent plantings. Dense ferns were located closer to the creek. Some erosion of the banks allowed for inspection (Figure 32); however no archaeological material was identified. Mangroves were present in the creek inlet where there has been some silt build-up.
48. The fourth paddock was in grass, undulating from the steeper part of the previous paddock near the Prison unit down towards Pāremoremo Creek. Pine was present along the top of the bank, and the presence of a previous landfill precluded close inspection of this area.
49. The fifth paddock was a large open area with some undulation. This paddock was previously heavily disturbed during the installation of a major gas pipeline. The paddock is bounded by the stream (indicated by pink arrow in Figure 23) to the south and by Pāremoremo Creek to the west. Midden site R10/831 was believed to be present along this section of Pāremoremo Creek, and the focus of the survey was within the area bordering the creek. There was generally bush all along the creek with some pine present. A flattish area near the juncture of the stream and Pāremoremo Creek was probed but no shell was located. A second low terrace further north was located which better matched the description provided in the SRF (Figure 33, left). The area was unfortunately covered with a lot of modern rubbish. Probing, however, detected shell in this location. A test pit (TP2) was inserted locating shell at a depth of 12cm (Figure 33, right). Shell observed included cockle with some horn shell present which was highly fragmented. This site was identified as likely site R10/831.

Macrocarpa trees were present above the terrace with fern at the back of the terrace, whilst in front of the terrace were mahoe and totara, with young plants by the fenceline.

50. Further along the creek bank there was a cleared area with a few trees, sloping towards the creek before dropping c.60cm to the creek. The stream was noted to continue to the north, bordered by relatively open old growth manuka on both sides. A culvert with a land bridge over the top was present (Figure 34). The stream appears to originate to the east, passing through the field from the southwest corner of the Prison unit. The open grassed area between the farm bridge and the Prison unit did not show any archaeological features.
51. The area on the northern side of the stream was largely old growth manuka but was situated on a large flattish area above the slope to the stream (Figure 35). The area was c.15m wide x c.40m long and was potentially a location that might have been inhabited for a short time. Probing around the area did not locate any subsurface shell material. A test pit (TP3) was inserted in this area. Measuring 25cm x 25cm x 11cm deep, the grey topsoil was very dry and very firmly compacted and overlay a clay loam (Figure 36).
52. To the north of the old growth manuka was an open grass paddock with a steep slope on the northern side. There was a raised area which could potentially be described as a manmade terrace around a knoll on the western end. There was a lot of gorse on the southern and western sides of this area. Over the fenceline alongside the stream was a flattish area largely in pine before dropping fairly steeply into the Pāremoremo Creek. Probing in these areas detected no archaeological material. Further inspection of the potential terrace-like area did not indicate whether the modifications were likely to be the result of Māori occupation or much later modifications to the grounds through farming, although the latter is considered more likely. There was a large flattish area above the terracing (Figure 37); however, probing did not detect any archaeological features or material. The ground was, however, particularly compact. To the east of the flattish area the paddock undulates (Figure 38), leading to another paddock to the northwest of the Prison unit. This paddock was almost completely flat with no visible archaeological features (Figure 39). Probing did not detect any subsurface features or material. The final paddock was also flat; however, it had been heavily disturbed in the past during the installation of the gas pipeline (Figure 40). This paddock has a track in the northeast corner that passes into Area 1 (Figure 41).



Figure 27. Photograph taken looking northeast along closed portion of Sanders Road showing bush on either side



Figure 28. Stitched image showing the exposed stratigraphy in the farm track cut in Area 2



Figure 29. Photograph taken in Area 2 looking east over paddocks on southern side of workshop and Prison unit with farm track to base of slope on right



Figure 30. Photograph showing ponga and ferns at base of slope above the stream in Area 2



Figure 31. Photograph showing the detail of test pit 1 (TP1) in Area 2 located on the slope between the stream and the fenceline



Figure 32. Photograph showing exposed section of eroded creek bank in Area 2



Figure 33. Left photograph showing location of test pit (TP2) on terrace in Area 2 and right showing the detail of the test pit



Figure 34. Photograph showing the land bridge over the top of a culvert in Area 2



Figure 35. Photograph showing the terrace on the north side of the narrow culverted stream in Area 2, under old growth manuka



Figure 36. Photograph showing detail of test pit (TP3) in Area 2, showing the hard compacted topsoil



Figure 37. Panorama of flattish area above possible terrace area in Area 2



Figure 38. Photograph looking east from flattish area in Area 2, showing undulation



Figure 39. Photograph showing paddock northwest of the Prison wall in Area 2



Figure 40. Photograph showing view from the east across the northern part of paddock adjacent to the Prison unit in Area 2



Figure 41. Photograph showing farm track leading from northeast corner of Area 2 into southwest corner of Area 1

Area 3

53. Area 3 was located on the southeastern edge of the survey area, accessed from Merewhira Road and had a permanent stream (indicated by white arrow in Figure 23) in the northern part at a lower elevation. Area 3 was separated into two main paddocks with a post and wire fence, resulting in an east and a west paddock. Cows and young cattle were grazing in the area at the time of survey; however, they did not impede the survey. The property was accessed via a gate on Merewhira Road and there was a telecommunication tower in the southeast corner of the westernmost paddock (Figure 42). The paddocks were generally flattish at the southern end before sloping fairly steeply towards the stream and wetland at the northern end. There was no terracing, and the slope would not have been attractive for settlement (Figure 43). Probing did not detect any subsurface archaeological remains in either paddock.
54. At the lowest elevation, at the northern end of the area, was a flattish area under pines bisected by the stream and passing through a culvert beneath Merewhira Road to the east (Figure 44). The areas alongside the stream on both sides were generally in pine, but other species such as gum, cabbage tree (on the northern side), and native shrubs were present. The northern side was reached by a track leading over the stream on the eastern side (Figure 45). The terrace-like area was probed, tree bases and exposed soils were inspected; however, no shell material was located (Figure 46, left). A test pit (TP5) was inserted in the larger terrace area on the southern side of the stream. Measuring 15cm x 15cm, the silty dark grey topsoil was moderately compacted, reaching a depth of 4cm where it overlay a light grey interface of 2cm thickness, in turn overlying hard natural grey clay (Figure 46, right). There were no indications of archaeological remains in area 3.
55. It is noted that no archaeological remains apart from the previously recorded archaeological site were identified during the survey, however, as the stream banks (locations where shell midden sites are often located) tended to be heavily vegetated and steep in some cases, the possibility that archaeological sites, such as shell midden that were not able to be detected during the surveys cannot be completely excluded.



Figure 42. Looking northeast across the upper portion of Area 3 showing the telecommunication tower at the edge of the westernmost paddock



Figure 43. Looking up the slope towards Merewhira Road in the easternmost paddock of Area 3



Figure 44. Panorama of part of the lower elevation on the southern side of the stream in Area 3 showing flattish areas and stream passing (right to centre left)



Figure 45. Photograph showing the track leading over the stream in Area 3 to the northern side



Figure 46. Left photograph showing the location of test pit 5 (TP5) on the flattish area on the southern side of the stream in Area 3 – yellow dot; and right photograph showing the detail of the test pit

Area 4

56. This area covers the property at 505 Pāremoremo Road. The property is accessed from Pāremoremo Road and there is a large, gravelled parking area in front of an existing community hall building with water tanks (photographs in Figure 47 and Figure 48). There is also a grassed paddock in the northwestern part of the property, although part of this paddock has undergone recent land disturbance for installation of disposal fields (Figure 49). The southern part of the property consists of a treelined grassed area. Three test pits were undertaken during the survey two in the south and one in the northwestern paddock with the locations are shown in .

57. The southern area was found to consist of gently undulating land with an overland flow path between the property and Merewhira Road. The flow path turns into the property and runs across it in the south. Probing did not indicate the presence of any subsurface archaeological deposits. Test pit (TP6) was located to the south of the community hall building. The test measured 20cm x 20cm and consisted of a dark

yellowish brown silt topsoil to a depth of 5cm over a slightly clayey yellowish brown silt to a depth of 15cm where a mottled yellow-grey natural clay was encountered (photographs in Figure 50 and Figure 51). A second test pit (TP7) was located at the southern end of the property on a gentle slope running up to Merewhira Road. This test pit also measured 20cm x 20cm. This test pit showed a yellowish brown silt topsoil to a depth of 10cm which overlay a mottled yellow/ orange and grey clay (photographs are shown in Figure 52 and Figure 53).

58. The part of the paddock in the northwest of the property that had not been affected by the recent disposal field works was probed and it was found to contain a hard layer between 5cm and 20cm below the ground surface. A test pit (TP8) was located in this area to identify the nature of the hard layer. The test pit showed a grey-brown silt turf with grass roots to a depth of 5cm over a grey-brown silt with pieces of gravel visible to a depth of 18cm, where a layer of larger stones/ aggregate was identified (photographs are shown in Figure 54 and Figure 55).
59. No archaeological features or deposits were identified in Area 4.



Figure 47. Photograph showing the community hall at 505 Pāremoremo Road, looking south



Figure 48. Photograph showing the water tank beside the community hall, looking northwest



Figure 49. Photograph showing the area where disposal field works have occurred, looking northwest



Figure 46. Photograph showing the southern paddock with the location of test pit (TP6) indicated by red arrow, looking south with detail of test pit in upper inset



Figure 51. Photograph of the southern paddock showing the location of test pit (TP7) indicated by red arrow and detail of test pit in upper inset

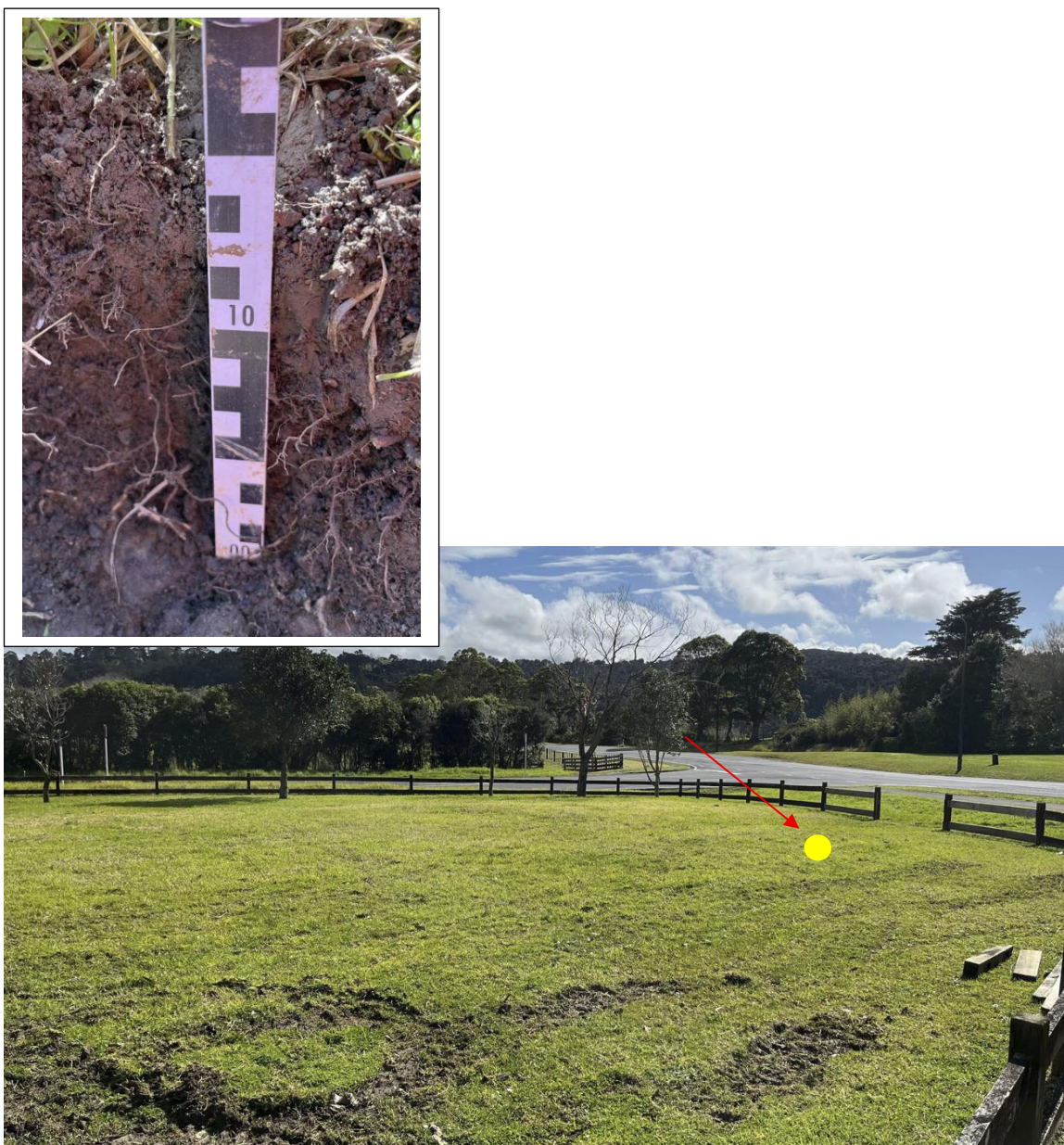


Figure 52. Photograph of the paddock in the northwest of the property with location of test pit (TP8) indicated by red arrow, looking northwest

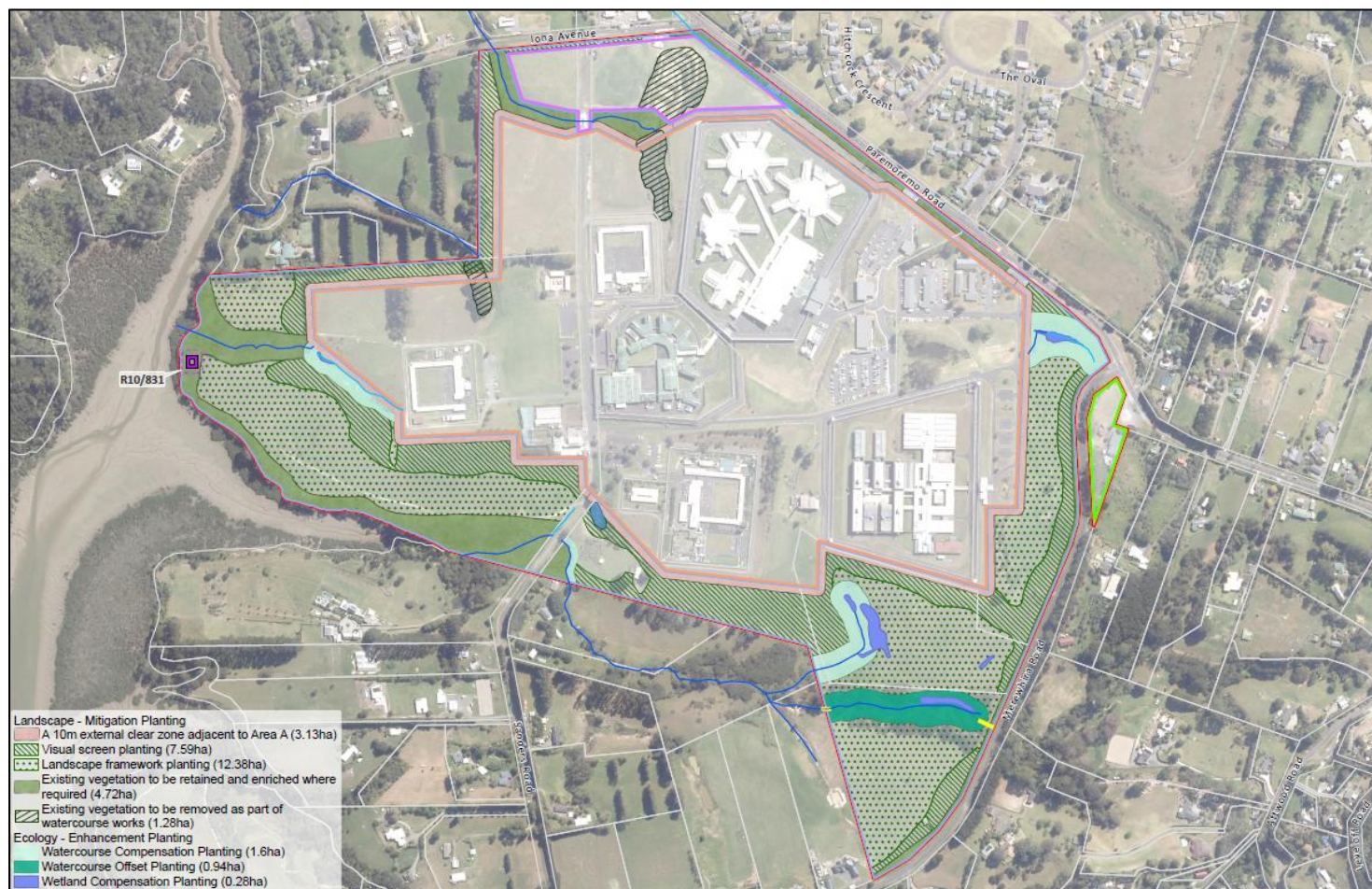


Figure 53. Landscape Mitigation and Ecology Enhancement Plan (LMEEP) (source: Boffa Miskell)

7 DISCUSSION AND CONCLUSIONS

7.1 Summary of Results

60. One archaeological site had been previously recorded in the Site. This is R10/831 (terrace/ midden) which is located on the banks of Pāremoremo Creek along the western boundary. Although no additional archaeological sites were identified during any of the surveys for the current or previous assessments in 2013, 2014 and 2025, it is considered that the area bordering Pāremoremo Creek and also along streams have the potential to contain additional sites associated with Māori occupation and settlement in the form of shell midden. This is based on the nature and location of sites recorded in the vicinity. The remainder of the Site is considered to have low potential for containing archaeological sites based on the topography and evidence of past modifications from Prison construction and agriculture. Based on the research presented in this assessment, pre-1900 European activities appear to be mainly associated with timber felling and possibly gum digging. There is no evidence of a homestead in the Designation area prior to 1900 and the potential for encountering archaeological sites associated with early European settlement are considered low.

7.2 Māori Cultural Values

61. This is an assessment of archaeological values and does not include an assessment of effects on Māori cultural values. Such assessments should only be made by the tangata whenua. Māori cultural concerns may encompass a wider range of values than those associated with archaeological sites and consultation with Māori and Iwi groups has occurred as described in the Māori Consultation and Cultural Values Assessment report provided in Volume 1, Appendix F to the substantive application.

62. The historical association of the general area with the tangata whenua is evident from the recorded archaeological sites, traditional histories and known Māori place names.

7.3 Survey Limitations

63. It should be noted that archaeological survey techniques (based on visual inspection and minor sub-surface testing) cannot necessarily identify all sub-surface archaeological features or detect wāhi tapu and other sites of traditional significance to Māori, especially where these have no physical remains.

7.4 Archaeological Value and Significance

64. The Auckland Regional Policy Statement (RPS) B5.2.2 (Policies Identification and Evaluation of Historic Heritage Places) identifies several criteria for evaluating the significance of historic heritage places. In addition, Heritage NZ, has provided guidelines setting out criteria that are specific to archaeological sites (condition, rarity, contextual value, information potential, amenity value and cultural associations)

(Heritage NZ 2019: 9-10). Both sets of criteria have been used to assess the value and significance of the archaeological site R10/831 (terrace/ midden) in Table 3 and

65. Table 4.

66. The archaeological value of sites relates mainly to their information potential, that is, the extent to which they can provide evidence relating to local, regional and national history using archaeological investigation techniques, and the research questions to which the site could contribute. The surviving extent, complexity and condition of sites are the main factors in their ability to provide information through archaeological investigation. For example, generally pā are more complex sites and have higher information potential than small midden (unless of early date). Archaeological value also includes contextual (heritage landscape) value. Archaeological sites may also have other historic heritage values including historical, architectural, technological, cultural, aesthetic, scientific, social, spiritual and traditional values.

67. Overall, site R10/831 is considered to have limited to moderate archaeological value based on the criteria discussed, with the moderate value arising from knowledge potential, as it is likely to contain material suitable for radiocarbon dating and environmental analysis which can provide information on local resource procurement and dates of occupation.

Table 3. Assessment of the archaeological values of site R10/3434 (terrace/ midden) based on Heritage NZ criteria (Heritage NZ 2019: 9-10)

Value	Assessment
Condition	The midden appears to have been damaged by modern activities (modern rubbish was present).
Rarity	Shell midden sites are common both locally and regionally.
Contextual value	The Site is one of a collection of sites relating to wider Māori settlement along Pāremoremo Creek. Other sites in the wider archaeological landscape consist of pits, midden, terraces and pā. The Site therefore represents one element in an extensive archaeological landscape.
Information potential	The Site has moderate potential to provide information relating to Māori settlement in the area through environmental analysis and radiocarbon dating.
Amenity value	The Site has no amenity value as it is located on Crown-owned land, within the current Designation 3900, with no public access and is subsurface, which means it is not able to be viewed and appreciated by an observer. As the public cannot access the Site it cannot contribute to the perceived pleasantness or attractiveness or contribute to defining the heritage character of the area.
Cultural associations	The cultural significance of the Site is for tangata whenua to determine.
Other	No other values have been identified.

Table 4. Assessment of the historic heritage significance of site R10/831 (terrace/ midden) based on the criteria in the AUP OP (Chapter B5.2.2)

Criterion	Comment	Significance Evaluation
a) historical: The place reflects important or representative aspects of national, regional or local history, or is associated with an important event, person, group of people or idea or early period of settlement within New Zealand, the region or locality	The date of the Site is not known but based on the presence of the surrounding archaeological sites it is likely to be prior to contact with Europeans. It is not known to be associated with any important historical events or people.	Limited
b) social: The place has a strong or special association with, or is held in high esteem by, a community or cultural group for its symbolic, spiritual, commemorative, traditional or other cultural value	There are no known community or cultural associations.	None
c) Mana Whenua: The place has a strong or special association with, or is held in high esteem by, Mana Whenua for its symbolic, spiritual, commemorative, traditional or other cultural value	To be determined by mana whenua	Not assessed
d) knowledge: The place has potential to provide knowledge through scientific or scholarly study or to contribute to an understanding of the cultural or natural history of New Zealand, the region, or locality	There is potential for material suitable for radiocarbon dating and potentially artefacts to provide new information relating to resource procurement and date of occupation through scientific analyses.	Moderate
e) technology: The place demonstrates technical accomplishment, innovation or achievement in its structure, construction, components or use of materials	The Site does not contain any structural elements.	None
f) physical attributes: The place is a notable or representative example of a type, design or style, method of construction, craftsmanship or use of materials or the work of a	The Site does not contain any notable features.	None

Criterion	Comment	Significance Evaluation
notable architect, designer, engineer or builder;		
g) aesthetic: The place is notable or distinctive for its aesthetic, visual, or landmark qualities	No notable or distinctive features are known.	None
h) context: The place contributes to or is associated with a wider historical or cultural context, streetscape, townscape, landscape or setting	The Site is one of the many sites associated with Māori occupation and settlement along Pāremoremo Creek. Other sites in the wider archaeological landscape consist of pits, midden, terraces and pā. The Site therefore represents one element in an extensive archaeological landscape	Little to Moderate

7.5 Potential Effects of the Proposal

68. Future development within Area A and Area B as shown in Figure 3, would not affect the recorded archaeological site R10/831 (shell midden) which is located along the banks of Pāremoremo Creek in Area C. The archaeological feature is located within the area of “Existing Indigenous vegetation and native planting (to be retained and augmented where required)” in the proposed Landscape and Ecological Mitigation and Management Plan (LMEEP), contained in Figure 47. The location of site R10/831 as is identified on the LMEEP, is therefore supported with a 10 metre setback from the feature to ensure future activities do not disturb or modify the identified feature.

69. The following Designation conditions are recommended:

- DES21: No land disturbance shall (other than planting by hand) shall occur within 10 metres of archaeological site R10/831 identified on the LMEEP
- DES22: In the event of sensitive material being uncovered during the course of any land disturbance or other works within the Auckland Prison Site, the requiring authority shall cease works and secure the area; inform tangata whenua and relevant authorities of the discovery; wait for and enable an inspection of the Site and ensure requirements are met prior to the commencement of works.²

² The full conditions are included in this report in **Appendix B**.

70. In any area where archaeological sites have been recorded in the general vicinity of a proposed development (in this case including the entire Designation area), it is also possible that additional subsurface archaeological remains may be exposed during future development. Based on current information and the findings of this assessment the types of archaeological sites that may be encountered during development would most likely be shell midden in the vicinity of Pāremoremo Creek or possibly along other waterways and would have a similar (low-moderate) archaeological value to site R10/831.
71. The land along the border of Pāremoremo Creek is identified as “existing indigenous vegetation and native planting (to be retained and augmented where required) in the LMEEP, meaning disturbance in the areas bordering the coast with highest potential for unrecorded archaeological features is expected to be minimal and the planting works should avoid any archaeological sites encountered.
72. Overall, potential effects on archaeological values from future development within the Site are considered to be minor because if an Authority is not in place the accidental discovery conditions must be adhered to, and:
- a) There are no recorded archaeological sites within the Site except for midden site R10/831 which has limited -moderate archaeological value and will be avoided.
 - b) and any unidentified archaeological sites of a similar nature that may be present are likely to be located along the coastline which is located some distance from the areas of the Site where new Prison facilities will be located, in areas for existing indigenous vegetation to be retained, with some possible revegetation, which should avoid any archaeological sites if encountered as part of the proposed Auckland Prison Designation alteration.
73. Although an Authority will not be required for future works in the Site as the recorded archaeological site R10/831 will be avoided, the presence for additional subsurface archaeological remains, particularly in the vicinity of Pāremoremo Creek and other waterways cannot be completely excluded. As such, for risk management purposes an Authority to cover any proposed works, including enabling works and planting, should be sought by the Department of Corrections as a precaution. The Authority should be obtained before any earthworks are carried out. The conditions of the Authority are likely to include archaeological monitoring of preliminary earthworks and/or planting, and procedures for recording any archaeological evidence before it is modified or destroyed. This approach will have the advantage of allowing any archaeology uncovered during the development of the property to be dealt with immediately, avoiding delays while an Authority is applied for and processed.

7.6 Recommendations

74. There should be no constraints on the proposed Designation 3900 alteration on archaeological grounds, as the recorded archaeological site, R10/831 will be avoided, and effects can be mitigated through the provisions of the FTAA through archaeological monitoring and investigation for any currently unrecorded archaeological sites that cannot be avoided.
75. Future development plans should take account of the location of the recorded archaeological site R10/831 and ensure that no land disturbance occurs within 10m.
76. In the unlikely event that any unrecorded archaeological sites are identified and cannot be avoided, an Authority must be applied for and granted prior to the start of any works that will affect archaeological remains. (*Note that this is a legal requirement*).
77. As the presence of unrecorded subsurface archaeological sites in the Site cannot be completely excluded, an Authority in advance of future works (including enabling works and planting) should be sought by the Department of Corrections, as a precaution to minimise delays if archaeological remains are exposed once works are underway.
78. If an Authority is not in place, and subsurface archaeological evidence should be unearthed during future development works including planting (e.g. intact shell midden, hangi, or storage pits relating to Māori occupation, or cobbled floors, brick or stone foundation, and rubbish pits relating to 19th century European occupation), or if human remains should be discovered, the Accidental Discovery Designation Condition must be followed. This requires that work ceases within 20m of the discovery and notification to the Auckland Council, Heritage NZ, Mana Whenua and (in the case of human remains) the NZ Police, who will determine the actions required.

7.7 Conclusions

79. One archaeological site, R10/831 (midden) has been identified along Pāremoremo Creek which makes up the western boundary of the Site. R10/831 was previously recorded in the Auckland Council CHI in an inaccurate location which was to the south of the Site. However, the information in the NZAA site record and the survey for this assessment have confirmed that the location of R10/831 is along the western boundary of the Auckland Prison Site.
80. The Designation conditions will ensure that the recorded archaeological site R10/831 is avoided during future development. There is, however, some potential for additional unidentified subsurface remains associated with Māori occupation and settlement to be present within the Site. However, the main area of archaeological interest is along and in proximity to Pāremoremo Creek in Area C, some distance from the proposed development areas A and B and the proposed works in Area C consists of revegetation planting, which should avoid any archaeological sites if encountered.
81. Based on the past modifications to the Auckland Prison Site from earthworks associated with the construction of Prison facilities and agricultural activities, as well

as the limited-moderate archaeological value of the identified archaeological site within the Site, any effects on archaeological values from future development are considered likely to be minor. As well, if any additional archaeological sites are present, they are likely to be of a similar nature and archaeological value to R10/831 which is limited-moderate value for reasons expressed above.

82. Although an Authority will not be required for future works in the Site as the recorded archaeological site R10/831 will be avoided, the presence of unrecorded subsurface archaeological remains cannot be completely excluded. As such, an Authority in advance of future works (including enabling works and planting) will be sought by the Department of Corrections, as a precaution to minimise delays if archaeological remains are exposed once works are underway. This will be submitted via the Fast-Track Approvals Act 2024 at the same time as the Notice of requirement to alter the designation to enable an increase in prisoner capacity.

8 BIBLIOGRAPHY

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- Bickler, S. and R. Clough. 2014. Auckland Prison, Pāremoremo: Archaeological Assessment. Clough & Associates report prepared for Fletcher Construction Company Limited.
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- Heritage NZ. 2019. Writing Archaeological Assessments. Archaeological Guidelines Series No. 2.
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APPENDIX A: SITE RECORD FORM R10/831

NEW ZEALAND ARCHEOLOGICAL ASSOCIATION INCORPORATED

		<h1>Site Record Form</h1>	
NZAA Site Number:	R10/831	Site Coordinates (NZTM)	
Imperial Site Number:		Easting:	1745946
Site Type:	Midden/Oven	Northing:	5930775
Site Name(s):		Source:	CINZAS



Scale: 1:2,500 Disclaimer: Polygon may not reflect the full extent of the site

<p>Finding Aids to the Location of the Site: Situating within the coastal fringe, within the dense vegetation, within large tree roots</p>
<p>Brief Description: Terrace in bank of creek, shell midden eroding from creek edge</p>
<p>Condition of Site when last visited: No Recent Info</p>

Printed by: CLOU_EllenCameron_ArchSite

Date Report Created: 20/04/2025

NEW ZEALAND ARCHEOLOGICAL ASSOCIATION INCORPORATED

Site Periods:

Indigenous pre-1769

Ethnicity:

Maori

Site Features:

Terrace, Midden

Associated Sites:

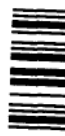
Description:

Updated 13/03/2025 (Field Visit), submitted by: CLOU_GlenFarley_ArchSite, visited 20/02/2025 by Jen Low; Kirstin Roth

Roughly a 2m midden, situated within the coastal fringe, within the dense vegetation. Significant disturbance by trees, and large amount of modern rubbish.

Condition Notes:

Date Report Created: 20/04/2025

New Zealand Archaeological Association SITE RECORD FORM (NZMS 260)		NZAA METRIC SITE NUMBER: R10/ 831
NZMS 260 map number: R10 NZMS 260 map name: WHANGAPARAOA NZMS 260 map edition: 1		DATE VISITED: 25 JANUARY 1996 SITE TYPE: TERRACE/MIDDEN SITE NAME: MAORI OTHER
<i>Grid References</i>	Easting: 2656450	Northing: 6492200
1. Aids to relocation of site (<i>attach a sketch map</i>): Proceed down Sanders Road to the low security wing of prison. Turn left (behind maintenance workshops) into paddock and continue on down to Paremoremo Creek, site is situated in reserve strip on west facing bank of creek. Terrace cutting is quite visible.		
2. State of site and possible future damage: Good condition not likely to suffer future damage		
3. Description of site (<i>Supply full details, history, local environment, references, sketches, etc. If extra sheets attached include a summary here</i>): A west facing terrace approximately 2.5m above the creek along bank. Terrace measures 10m long x 5m wide and has been cut into bank. Probing and test pit revealed shell midden - crushed cockle and piece of red ochre.		
4. Owner: Justice Department Address: Auckland Prison		Tenant/Manager: Ken Marchant Address: Auckland Prison
5. Nature of information (<i>hearsay, brief or extended visit, etc.</i>): survey visit Photographs (<i>reference numbers, and where they are held</i>): Aerial photographs (<i>reference numbers, and clarity of site</i>): SN 8772 G/10		
6. Reported by: Jeff Mosen (Bioresearches) Address: Box 2828, Auckland 1		Filekeeper: Date:
7. Key words: TERRACE; SHELL MIDDEN; AUCKLAND PRISON; PAREMOREMO CREEK		
8. New Zealand Register of Archaeological Sites (<i>for office use</i>) NZHPT Site Field Code		
Latitude S <input type="checkbox"/> Type of site <input type="checkbox"/> Local environment today <input type="checkbox"/> Land classification	Longitude E <input type="checkbox"/> Present condition and future danger of destruction <input type="checkbox"/> Security code <input type="checkbox"/> Local body	
New Zealand Archaeological Association SITE RECORD FORM (NZMS 260) ADDITIONAL INFORMATION SHEET		

APPENDIX B: ACCIDENTAL DISCOVERY PROTOCOL DESIGNATION CONDITIONS (DES22)

In the event of sensitive material being uncovered during the course of any land disturbance or other works within the Site, the requiring authority shall take the following steps:

(a) Cease works and secure the area

- (i) Immediately cease all works within 20m of any part of the discovery, including shutting down all earth disturbing machinery and stopping all earthmoving activities.
- (ii) Secure the area of the discovery, including a sufficient buffer area to ensure that all sensitive material remains undisturbed.

(b) Inform tangata whenua and the following relevant authorities immediately of the discovery

- (i) The New Zealand Police, if the discovery is of human remains or koiwi. Auckland Council, in all cases.
- (ii) Auckland Council in all cases.
- (iii) Heritage New Zealand Pouhere Taonga, if the discovery is an archaeological site, Māori cultural artefact, human remains or koiwi.

(c) Wait for and enable an inspection of the site

- (i) Wait for and enable an inspection of the site by tangata whenua and the relevant authorities.
- (ii) The requiring authority shall arrange an inspection of the area by a suitably qualified and experienced archaeologist (“the archaeologist”)
- (iii) Following the inspection by the archaeologist and consultation with all relevant parties (including the requiring authority), and based on the expert cultural advice of tangata whenua, the archaeologist shall determine the area within which work must cease.

(d) Resumption of work

- (i) Work within the area determined by the archaeologist in (c)(iii) above must not recommence until all of the following requirements, so far as relevant to the discovery, have been met:
- (ii) Heritage New Zealand Pouhere Taonga has confirmed that an archaeological authority has been granted for the work or that none is required.

- (iii) Any required notification under the Protected Objects Act 1975 has been made to the Ministry for Culture and Heritage.
- (iv) Any material of scientific or educational importance must be recorded and if appropriate, recovered and preserved. The recovery or preservation of any archaeological material will require an authority under the Heritage New Zealand Pouhere Taonga Act 2014.
- (v) Any koiwi have either been retained where discovered or removed in accordance with the appropriate tikanga.

Note:

For the purpose of this condition, 'sensitive material' means:

Human remains and koiwi.

An archaeological site.

A Māori cultural artefact/taonga tuturu.

A protected New Zealand object as defined in the Protected Objects Act 1975 (including any fossil or sub-fossil).

APPENDIX C: STATEMENT OF EXPERIENCE

This report has been prepared by the following author who have the following qualifications and expertise:

Name	Qualification/ Experience
Ellen Cameron	Refer to attached CV

Code of conduct for expert witnesses

In the context of this application, which is made under the Fast-track Approvals Act 2024, and in relation to which there may be no hearing, we have been asked to confirm that the reporting has been prepared in accordance with the Environment Court’s Code of Conduct for Expert Witnesses.

We confirm that we have read the Environment Court’s Code of Conduct for Expert Witnesses, as contained in section 9 of the Environment Court’s Practice Note 2023, and we agree to comply with it.

The data, information, facts and assumptions that we have considered in forming our opinions are set out in our technical report. The reasons for the opinions expressed are also set out in the technical report.

We confirm that the matters addressed in the technical report are within our area of expertise, with the exception of where we confirm that I we are relying on information provided by another person. We have not omitted to consider material facts known to us that might alter or detract from our opinions expressed. We have specified where our opinion is based on limited or partial information, and we have identified any assumptions we have made in forming our opinions.

Designation conditions have been developed to ensure that:

- (a) the development parameters are reflected in the Designation purpose and conditions; and
- (b) the adverse environmental effects from the proposal to increase capacity are avoided, remedied or mitigated.

Ellen Cameron has inputted into the development of the conditions, and where noted in the assessment of effects below, these have formed the basis for certain conclusions.

As set out below, in some instances assumptions have been made in this report about the physical characteristics and operations for future facilities. These assumptions are based on the maximum anticipated envelope of effects that are reasonably anticipated, based on

current design and operational models. Where necessary, recommendations are made in respect to these assumptions in the proposed conditions.

The assumptions made include:

- That the development areas will be located in Area A and Area B;
- That it is unlikely that any unrecorded archaeological sites are located in Area A and Area B based on the past modifications in these areas;
- That the works proposed in the Site outside of Area A and Area B in proximity to Pāremoremo Creek will primarily consist of vegetation removal and planting;
- That the recorded site R10/831 will be avoided;
- That any unrecorded sites outside of Area A and Area B will be avoided if possible, or if not able to be avoided, effects will be mitigated under the provisions under Section 44(a) of the HNZPTA.

Ellen CAMERON

Name: Ellen CAMERON

Present Position: Co-Director Clough & Associates New Zealand

Nationality: Canada/ New Zealand

Profession: Archaeologist

Specialisation: Archaeological Assessment/ Monitoring

Qualifications: BA, Sociology and Anthropology, Carleton University, Ottawa, Canada 1987
MSc, Environmental Archaeology and Palaeoeconomy, University of Sheffield, UK, 1991

Professional Association Membership: NZAA; IPPA.

Years of Experience 27

Profile

Ellen is a qualified archaeologist and cultural resource manager with over twenty years' experience in Hong Kong and 11 years' experience in New Zealand, where she has been based since 2014. Ellen has worked on numerous archaeological projects including excavations and impact assessment projects both in Hong Kong and New Zealand. She is also involved in the development of mitigation strategies for protection from various types of construction and development activities. Ellen is currently working on commercial archaeological projects in New Zealand including planning studies, assessments and archaeological monitoring and investigation.

Recent Relevant Experience

Cameron, E and R. Clough. Waikeria Prison Expansion Enabling Works: Archaeological Assessment (2024). Project Archaeologist responsible for the assessment and authority application. Input included updating the 2017 archaeological assessment and providing information on statutory information and mitigation recommendations.

Cameron, E. Low Emissions Ferry Project: Archaeological Assessment for Auckland Transport (2023-present). Project archaeologist and manager for three project areas for installation of electrical charging stations for new electric ferries. The scope includes assessment of impacts and field survey and preparation of archaeological advice and management plans for the electrical installations.

Cameron, E. 20 Musick Point Road and 4 Clovelly Road Replacement of Transformer and Switch Removal: Archaeological Assessment prepared for Osbornehay Ltd (2022). Project archaeologist for the project. Background research for the project included details of heritage sites located on heritage schedules and on the Heritage NZ List/ Rārangī Kōrero and providing information on statutory requirements and mitigation recommendations.

Cameron, E. and D. Gaylard. Proposed Papatūia Solar Farm near Kaitiāia Northland: Archaeological Assessment for Ranui generation Ltd (2023). Project archaeologist and manager for the assessment of the site for a new solar farm, including identification of impacts and mitigation requirements and archaeological management plan.

Ellen CAMERON

Cameron, E. Downtown Carpark Redevelopment: Archaeological Assessment for Precinct properties (NZ) Ltd (2022- present). Archaeological assessment and development of strategies for investigation and recording of archaeological deposits, preparation of archaeological management plan.

Cameron, E. St Heliers, Undergrounding of Services and Installation of Street Lights: Archaeological Assessment prepared for Vector (2022-2023). Archaeological assessment and mitigation measures. Also included preparation of an archaeological management plan and monitoring programme.

Cameron, E. Ariki Tahī, Sugarloaf Wharf Expansion, Te Kouma, Coromandel: Archaeological Assessment. Project archaeologist for the project which included the preparation of assessment report and field survey, historical research for identification of archaeological remains associated with Māori occupation sites with management plan and monitoring programme was also included.

Cameron, E. Paerata Road Culvert Upgrade (Hickeys Recreation Reserve), Pukekohe: Heritage Impact Assessment for Tonkin & Taylor Ltd (2022). Project archaeologist for the project which included the preparation of assessment report and field survey, historical research for identification of archaeological remains associated with an historic flour mill. The preparation of a management plan and monitoring programme was also included.

Cameron, E. Cambridge Growth Cell C5, Leamington, Proposed Future Residential Development: Preliminary Archaeological Assessment prepared for Cogswell Surveyors Ltd (2021). Project archaeologist for the assessment and field survey of the growth cell. Identification of archaeological sites and preparation of mitigation measures.

Cameron, E. R. Clough and G. Farley. Kotare Park Proposed Residential Subdivision, Cambridge. Clough & Associates report prepared for Kotare Properties Ltd (2021). Project archaeologist for the assessment and field survey in a Māori horticultural landscape. The scope included identification of archaeological sites and areas of archaeological potential through field survey and preparation of a management plan and monitoring programme.

Cameron, E. Drury Town Centre assessment and archaeological monitoring for Kiwi Land Ltd (2017-present). Project archaeologist for all stages of the project from private plan change to archaeological monitoring during construction. This scope included preparing and presenting evidence for hearings based on assessments.

Cameron, E. and R. Clough. Prison Capacity Project Phase 2: Waikeria Prison, Waikato for Boffa Miskell (2017). Project Archaeologist for the assessment, including background research and field survey. The scope also included preparation of evidence for hearing in the Environmental Court.

Employment History

2014 to date	Senior Archaeologist (Co-Director from 2022) at Clough & Associates
1999 to 2014	Senior Archaeologist (Co-Director from 2005) at Archaeological Assessments Ltd Hong Kong
1992 to 1996	Freelance Archaeologist in Hong Kong