1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Auckland Surf Park Community Stage 2
Fast-Track application number:	FTAA-2606-1246
Council reference number:	BUN60467823

2.0 Technical Specialist Memo – Earthworks & Erosion and Sediment Control

To:	Brooke Dales, Consultant Planner Warwick Pascoe, Principal Project Lead
From:	Leo Gallagher, Specialist Archaeology, Cultural Heritage Implementation Team, Heritage Unit, Planning and Resource Consents Department, Policy, Planning and Governance Directorate
Qualifications & Relevant Experience:	I hold the qualification(s) of: Bachelor of Arts (BA) and Master of Arts (MA) in Archaeology and have 3 years of experience in historic heritage and archaeological resource management under the RMA (Part 2, Section 6 e and f matters) and the HNZPT Act (2014). I am a full member of the New Zealand Archaeological Association. I have prepared expert evidence and technical assessments for resource consent applications, and fast-track applications.
Preparation in Accordance with the Code of Conduct:	I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.
Signature:	

Date: 02/10/26

3.0 Executive Summary

AW Holdings 2021 Limited has lodged resource consent application BUN60467823, for Stage 2 of the Auckland Surf Park development. The proposal includes the development of an AI data centre, approximately 500 residential housing units, subdivision, and associated infrastructure works at 1350 Dairy Flat Highway and surrounding land parcels. The development involves extensive earthworks and construction activities across the project area as part of the broader Auckland Surf Park project.

This memorandum reviews the potential archaeological and historic heritage effects associated with the proposal. The assessment identifies that the project will not affect any scheduled historic heritage places identified in Schedule 14.1 (Schedule of Historic Heritage) of the Auckland Unitary Plan Operative in Part, nor are there any sites listed on the New Zealand Heritage List/Rārangi Kōrero within the application area. However, one known unscheduled archaeological site is located within the project footprint, being a pre-1900 corrugated iron villa (HI-14937; NZAA R10/1580) situated within the south-western corner of the site and proposed to be demolished as part of the development.

To assess and manage potential archaeological effects, the applicant has provided an Assessment of Environmental Effects and supporting archaeological assessment prepared by CFG Heritage Ltd. The documentation confirms that Authority 2026-306 has been granted by Heritage New Zealand Pouhere Taonga for the demolition of the pre-1900 villa and associated earthworks, subject to conditions. The assessment also considers the operation of the Auckland Unitary Plan Accidental Discovery Rule (ADR), which will continue to apply to any archaeological material or sensitive materials discovered during the works that are not expressly provided for under the granted archaeological authority and any associated Archaeological Works Plan.

The assessment concludes that, provided the works are undertaken in accordance with Authority 2026-306, any associated Archaeological Works Plan, the recommended resource consent condition requiring compliance with the Auckland Unitary Plan Accidental Discovery Rule for discoveries not expressly covered by an authority, and the recommended advice notes, the potential archaeological and historic heritage effects of the proposal will be appropriately managed. Archaeological matters authorised under the Heritage New Zealand Pouhere Taonga Act 2014 will be managed through an authority framework, while any sensitive materials or discoveries outside the scope of that authority will remain subject to the Accidental Discovery Rule.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

Auckland Surf Park – Stage 2. June 2026. B & A Urban and Environmental, on behalf AW Holdings 2021 Limited.

Auckland Surf Park Community - Stage 2: archaeological assessment. October 2025. CFG Heritage Ltd on behalf of AW Holdings 2021 Limited.

Archaeological Authority 2026-306. 12 January 2026. Heritage New Zealand Pouhere Taonga.

Auckland Surf Park Community Resource Consent Decisions. Not Dated. B & A Urban and Environmental, on behalf AW Holdings 2021 Limited.

Auckland Surf Park Civil Drawings - Part 1.

Auckland Surf Park Civil Drawings - Part 2.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

The applicant has identified the reasons for consent relating to earthworks under chapter E11 of the Auckland Unitary Plan (AUP). I concur with those reasons for consent.

6.0 Specialist Assessment

Archaeological and Historic Heritage Effects

The potential archaeological and historic heritage effects of the proposal are primarily associated with the demolition of a known pre-1900 structure and the earthworks required for the development of an AI data centre, approximately 500 residential housing units, subdivision, and associated infrastructure works at 1350 Dairy Flat Highway and surrounding land parcels.

Archaeological Sites

The proposed works, as described in the Assessment of Environmental Effects and supporting documentation, do not affect any archaeological sites scheduled in Schedule 14.1 (Schedule of Historic Heritage) of the Auckland Unitary Plan Operative in Part. In addition, there are no historic heritage places within the application area recorded on the New Zealand Heritage List/Rārangi Kōrero.

The applicant's archaeological assessment identifies one known unscheduled archaeological site within the project area. This site is recorded as HI-14937 (NZAA R10/1580), comprising a pre-1900 corrugated iron villa located within the south-western corner of 1350 Dairy Flat Highway. The structure remains extant and is proposed to be demolished as part of the development.

The archaeological assessment prepared for the proposal notes that an authority would be required for the demolition of the villa and any modification of archaeological remains associated with the site. The Assessment of Environmental Effects confirms that Authority 2026-306 has been granted by Heritage

New Zealand Pouhere Taonga for the demolition of the pre-1900 villa and associated earthworks, subject to conditions.

I consider that the granted Authority 2026-306 provides an appropriate statutory mechanism for the management of archaeological effects associated with the known archaeological site. Archaeological matters covered by the authority are anticipated to be managed through the authority process and any associated Archaeological Works Plan.

Accidental Discovery Rule

The Auckland Unitary Plan Accidental Discovery Rule (ADR) provides an operational framework for the management of previously unidentified sensitive materials, including archaeological sites. The rule applies unless the relevant matter is expressly provided for by a resource consent or another statutory authority.

Where archaeological matters are covered by Authority 2026-306 and any associated Archaeological Works Plan, those matters would be managed through that framework. However, any archaeological discoveries, historic heritage features, or other sensitive materials encountered during the works that are not expressly covered by the authority would continue to be managed through the ADR process.

I consider that the combined operation of the authority framework and the ADR provides an appropriate mechanism for the management of both known and previously unidentified archaeological resources that may be encountered during the proposed works.

Conclusion

An assessment of the archaeological and historic heritage aspects of the proposal has been undertaken. The proposed works do not affect any scheduled archaeological sites identified within the Auckland Unitary Plan or any places listed on the New Zealand Heritage List/Rārangi Kōrero. One known unscheduled archaeological site, being the pre-1900 villa recorded as HI-14937 (NZAA R10/1580), is proposed to be demolished under the conditions of Authority 2026-306, granted by Heritage New Zealand Pouhere Taonga.

Provided the works are undertaken in accordance with the application documents and supporting information, including Authority 2026-306 and any associated Archaeological Works Plan, I consider that the potential archaeological and historic heritage effects of the proposal will be appropriately managed.

7.0 Section 67 Information Gap

There are no section 67 information gaps relating to archaeology and historic heritage.

8.0 Recommendation

Based on the information available regarding the proposed earthworks and the nature and extent of ground disturbance, I support the applications proposed archaeological and historic heritage mitigation.

9.0 Proposed Conditions

The applicant has not proposed any archaeological conditions but has stated that they will comply with the Accidental Discovery Rule. As this is a district and/or regional plan requirement, it applies irrespective of whether it is reiterated as a consent condition. The appropriateness of referencing the rule within the consent conditions is a planning matter and is outside the scope of my archaeological assessment