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Pokeno Developments NZ Limited
31 October 2025

**Pokeno FTAA:
archaeological memo**

Introduction

Pokeno Developments NZ Limited proposes development across its landholdings for the Pokeno Housing and Tourism Project using the Fast Track Approvals Act 2024 (FTAA). A full list of properties is provided as Attachment B and show in Figure 1 below. Pokeno Developments NZ Limited commissioned CFG Heritage Ltd to prepare a memo outlining potential archaeological and heritage effects of the Project.

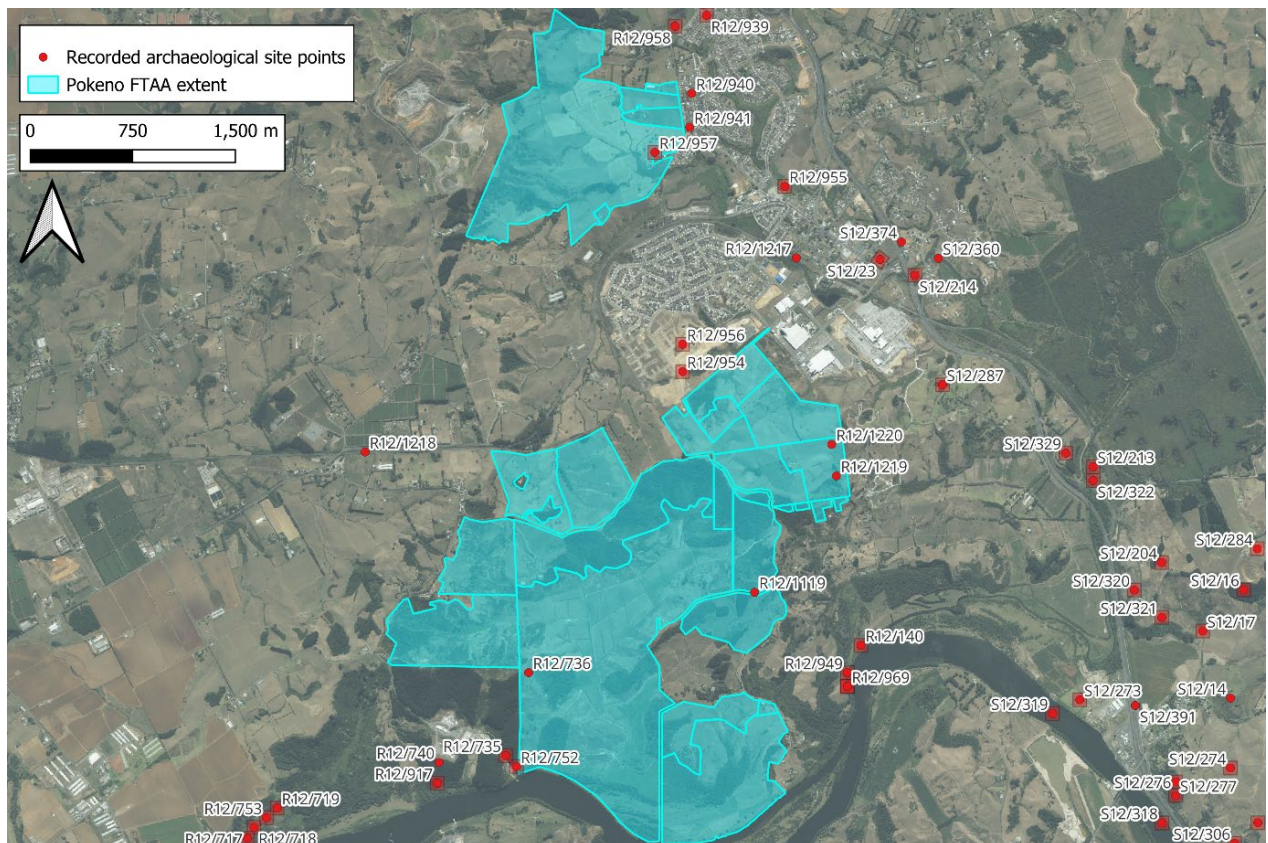


Figure 1. Proposed development area and surrounding archaeological sites.

Results

Summary of previous work

Some parcels in this Project area have been previously assessed by archaeologists (Figure 2). Three parcels (Blue) already have earthworks beginning for residential development under archaeological authority (2025/223) (of which the author of this report is the Section 45

archaeologist). The parcels coloured purple were assessed by Clough (Cameron, E. and R. Clough. 2018. Proposed Tata Valley Tourism Site, Pokeno: Archaeological assessment. Unpublished report prepared for Tata Valley Ltd). The remainder of the land has not been surveyed or considered by archaeologists before (Figure 2). We have reviewed the previous work undertaken by Clough (Figure 2).

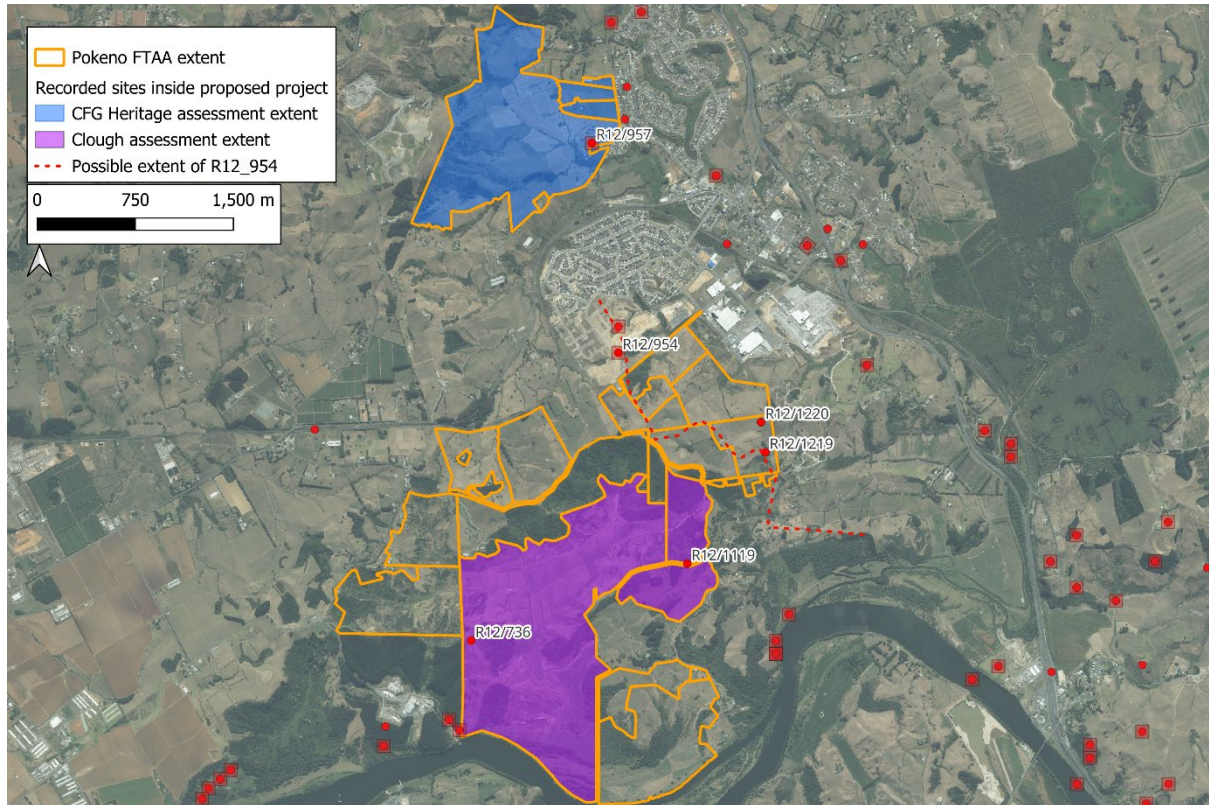


Figure 2. Map showing areas assessed before, areas where HNZPT authority is granted for works to be undertaken, and areas not yet considered by archaeologists.

Summary of sites

There are six archaeological sites recorded on the NZAA SRS inside the project extent (Figure 2). Namely:

- R12/736 – Kaineratou Pā
- R12/957 – Austin’s Farmhouse, historic house.
- R12/1119 – pre-European Māori storage pits.
- R12/1219 – Possible location of an 1860 signal station
- R12/1220 – Possible location of Te Wheoro’s Pā
- R12/954 – Possible subsurface extents of the original Great South Road

Landscape – While there are some recorded sites, the land flanking the Waikato River is widely accepted as a potentially dense archaeological landscape where additional potential previously unrecorded sites could be present. The absence of recorded sites in parts of the project area should not be taken to mean there are no sites present.

Summary and recommendations

The below relates to recommendations for further investigations and detailed design as part of the substantive application process:

Project wide

- There is a likelihood that potential previously unrecorded archaeological sites could be exposed during the works. Systematic archaeological survey could find and record some of those to help avoidance before the final design - but there will remain a risk that subsurface sites are exposed.
- Sites could be found and recorded during the assessment phase, and unless these are rare or significant site types such as (but not limited to) urupā or pā, can ideally be avoided or otherwise suitably managed through the HNZPT Act (2014).
- Should unrecorded pā or urupā (or other significant site types) be found during the assessment phase, avoidance via redesign is recommended.

Site specific

- There are six recorded archaeological sites in the proposed works area. All should be avoided in the early stages through design in the first instance. Possible sites (namely R12/954, R12/1219 and R12/1220) will require further investigation to consider the presence of archaeology (as described below) which should guide the avoidance.
- Kaineratou pā, (R12/736) should be visited and the extent mapped for an accurate understanding as part of a full archaeological assessment; and during the design and delivery phase must be avoided to prevent adverse effects to the site. The area of avoidance should involve discussions with a suitably qualified archaeologist.
- The possible subsurface extent of parts of the original Great South Road route (R12/954) has no known physical evidence to confirm if the site is in situ. Efforts should be made to confirm if the site is present and the nature of the deposits through ground penetration radar (GPR), and if deemed necessary by the archaeologist, a Section 56 authority to understand the nature of any deposits. If the site is present (in any location and extent) then avoidance through design is recommended. If the site cannot be avoided in the first instance through design, then, as with all sites, an application for an archaeological authority be made to HNZPT.
- The possible location of Te Wheoro's pā (R12/1220) has no physical evidence to confirm the pā is present or the recorded point is in the correct location – efforts should be made to confirm the true location and extent through ground penetration radar (GPR), and if deemed necessary by the archaeologist, a Section 56 authority to understand the nature of any deposits. If the site is present (in any location and extent) then avoidance through design is strongly recommended. This is not a statement of effects to cultural values to sites which only mana whenua can make.
- Similarly, the possible location of a 1860s signal station, R12/1219, has no known physical evidence. As above, efforts to relocate the site should be made, and avoidance recommended. If the site cannot be avoided in the first instance, then, as with all sites, an application for an archaeological authority be made to HNZPT.

- All other recorded sites should be re-located then mapped and avoided by design in the first instance.
- Unless new information gained during a site visit and further research determines otherwise, mitigation to unavoidable adverse effects can be addressed under archaeological provisions of the HNZPT Act (2014). Recommendations for avoidance should be in discussion with HNZPT regional archaeologists.
- If recorded sites are impacted either by not avoiding them, or through previously unrecorded discovery, there will be adverse effects to them when they are being destroyed through the earthworks or other development activities. The adverse effects to archaeological values can be managed through provisions of the HNZPT Act (2014). This is not a statement of effects to cultural values to sites which only mana whenua can make.

Description of the anticipated and known adverse effects of the project on archaeological contexts

The detailed design is not currently available and so the extent of ground disturbance is not yet known. This information will be provided as part of the substantive application. However, based on the information available to date and what is known about the archaeological record of the area so far it is possible to provide a summary of the likely effects.

Of the six archaeological sites recorded, it is considered likely that the works will impact on four sites (R12/954, R12/1119, R12/1219 and R12/1220). The effects to these sites will vary depending on the extent of works proposed and the confirmed physical presence of the site. However as noted above, if specific investigations find that R12/1220 is present (in any location and extent) then avoidance through design is recommended as effects of impacts may be high. Avoidance to offset negative effects to the other sites is recommended in the first instance.

R12/736 is not expected to be impacted (as noted above avoidance through design is recommended).

R12/957 falls within the existing Pokeno West Stage 1 area and is already approved to an authority to modify, meaning management and mitigation of the site effects are addressed elsewhere.

The detailed nature of effects on individual sites is unknown, but it is logical to assume that where works are proposed and archaeological sites are not avoided, they will be adversely affected during the ground disturbance phase. An archaeological assessment of effects with finalised ground disturbance plans can fully examine this. Sites should generally be avoided in the first instance by design, and where this is unfeasible and the site significance does not require it, effects can be appropriately mitigated through archaeological provisions of archaeological authority under the HNZPT Act.

Approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT Act))

It is noted that the FTAA includes provision for Schedule 5 Approvals relating to Resource Management Act 1991 and Schedule 8 (Approvals relating to Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT Act)) will be relevant to the archaeological requirements for the project's substantive application, if the project is referred.

The information requirements for a substantive application for an authority under the FTAA are the same as in the HNZPT Act and the archaeologist approved to undertake archaeological investigation must meet the same criteria as under the HNZPT Act (clause 7).

Based on the above information, an archaeological authority from HNZPT will be required to modify or destroy known and potential sites. These would likely be sought as part of the overall substantive application.

6 Conclusion

Previous work in the area confirm that six recorded archaeological sites are present in the vicinity of the Project. Three of these area based on desktop evidence (R12/954, R12/1219, and R12/1220), where there is no ground evidence is currently observed. It is recommended these are investigated (such as GPR and Section 56 investigations) and their true location extents understood before final design to help guide avoidance via design in the first instance where feasible.

At least three of these sites are likely to be directly impacted by the project. Also, the presence of potential previously unrecorded pre-European Māori sites is possible and effects to those can be mitigated via a HNZPT archaeological authority.

I recommend applying for an archaeological authority to modify or destroy known and potential sites.

Recommendations have been made for the substantive application stage including further assessments of the project area, and focused attempts to relocate some sites.

My experience and qualifications are set out in Attachment A.



Danielle Trilford
Principal Archaeologist

Attachment A: Qualifications and Experience

I am a Principal Archaeologist at CFG Heritage with over 16 years' experience in New Zealand Archaeology. I am a HNZPT Section 45 Approved Archaeologist. I have been on the New Zealand Archaeological Association's Executive Elect for 6 years, currently standing as Vice President, and a long-standing member of the association.

I confirm that I meet the criteria required to be an approved person to undertake an activity under the authority under sections 7(5) of the Act and 45(2)(a) of the Heritage New Zealand Pouhere Taonga Act 2014.

I have prepared Fast Track advice for:

- Proposed works The Point, Takaparawhau
- Proposed subdivision works at Ohaupō

Attachment B: List of Properties

Allot 6 Sec IX VILL OF Havelock, Allot 9 Sec X VILL OF Havelock, Allot NE68 PSH OF Mangatawhiri, Lot 1 DP 165370, Lot 1 DP 199997, Lot 1 DP 202491, Lot 1 DP 211605, Lot 1 DP 23610, Lot 1 DP 323377, Lot 1 DP 476640, Lot 1 DP 476886, Lot 2 DP 176087, Lot 2 DP 199997, Lot 2 DP 23610, Lot 2 DP 401106, Lot 2 DP 459108, Lot 2 DP 476886, Lot 2 DP 518134, Lot 3 DP 176205, Lot 3 DP 202491, Lot 3 DP 211605, Lot 3 DP 441406, Lot 3 DP 463893, Lot 3 DP 476640, Lot 4 DP 202491, Lot 4 DP 476886, Lot 5 DP 202491, Section 1 SO 501312, Section 2 SO 513144).