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SUBSTANTIVE APPLICATION FOR APPROVALS

Volume D – Archaeological Authorities

NZ Transport Agency Waka Kotahi
Tauriko West | Tupenga

31 JULY 2026

NZ TRANSPORT AGENCY WAKA KOTAHI

Tauriko West Tupenga | Roads of National Significance

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GLOSSARY OF ACRONYMS AND ABBREVIATIONS

The glossary of acronyms and abbreviations tables in **Volumes A and B** of the Substantive Application apply to this Volume and should be referred to.

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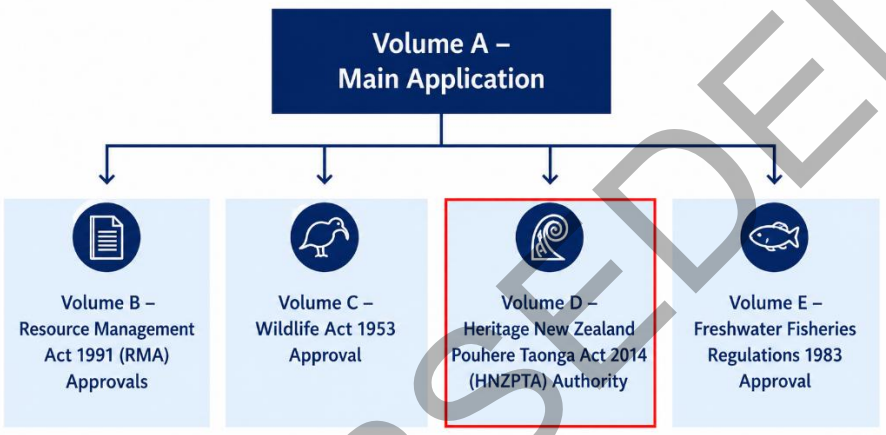
1 ARCHAEOLOGICAL AUTHORITIES

1.1 Overview

Volume D of the Application has been prepared on behalf of the NZ Transport Agency Waka Kotahi (NZTA) in support of the archaeological authorities required for the Tauriko West – Tupenga Project (the Project).

Volume D provides the archaeological assessment, identifies the recorded and potential archaeological sites that may be affected by the Project, and sets out the proposed approach to archaeological investigation and management.

Volume D should be read in conjunction with **Volume A**, which is the main overarching report for the Application and contains general information relevant to all approvals, and **Volume B**, which contains the assessment of effects and planning assessment for the RMA approvals.



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1.2 Authorities sought

This Volume of the Application has been prepared to support the three Archaeological Authorities sought for the Project under section 42(4)(i) and Schedule 8 of the FTAA.

The Archaeological Authorities are sought under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) to authorise Project Works that will or may modify or destroy archaeological sites, including recorded and unrecorded archaeological sites, within the Proposed Designation. The Authorities will also provide for the archaeological investigation, recording, analysis and reporting required in relation to those sites.

The authorities are sought for all Project Works within the Proposed Designation boundary and for a duration of 20 years. This duration is sought to align with the anticipated implementation timeframe for the Project, including the progressive acquisition of land and sequencing of construction works. The Archaeological Authorities may therefore be exercised progressively as Project Works proceed, and the necessary property interests and rights of access are obtained.

The three Archaeological Authorities have been separated to reflect the differing archaeological risk and geographic extent. The authorities sought are:

- **Authority 1:** An authority for the identified high archaeological-risk areas within the SH29 alignment, including areas containing recorded archaeological sites;
- **Authority 2:** An authority for the remainder of the SH29 alignment outside the areas covered by Authority 1, including existing and proposed road corridors; and
- **Authority 3:** An authority for the SH29A alignment east of 9 Nature Place.

NZTA also seeks approval for:

(a) The Archaeological Management Plan (AMP) and Research Strategy in **Volume D – Appendix B** as the framework for managing archaeological effects and undertaking the archaeological investigations authorised by the Archaeological Authorities; and

(b) Mr Matthew Campbell to undertake the activities authorised by the Archaeological Authorities, including the modification or destruction of identified and unidentified archaeological sites within the Proposed Designation boundary, pursuant to clause 7(2)(a) of Schedule 8 of the FTAA.

Mr Campbell's qualifications and experience, including his involvement in Tauriko West, Tauriko Business Estate (TBE) and Takitimu North Link projects, are set out in the Archaeological Assessment and demonstrate that he is an appropriate person to hold this approval for the purposes of clause 7(5) of Schedule 8 of the FTAA.

Volume D – Appendix E contains a letter from Mr Campbell confirming his willingness to act as the nominated person, that he has the necessary skills, experience and competency to undertake the authorised archaeological work, and that he has access to the professional, technical, institutional and cultural support required to complete that work.

This Volume should be read in conjunction with the Archaeological Assessment prepared by CFG Heritage in **Volume D – Appendix A**, the AMP and Research Strategy in **Volume D – Appendix B** and the proposed Archaeological Authority conditions in **Volume D – Appendix D**.

1.3 Land description

The land to which the Archaeological Authorities relate is the land within the Proposed Designation. The land within the Proposed Designation includes existing road reserve (both local roads and state highways), Crown-owned land, TCC land and privately owned land as shown on the Archaeological Authority Plans in **Volume D – Appendix C**.

The Archaeological Authority conditions (**Volume D – Appendix D**) provide a schedule of the addresses and legal descriptions relevant to each Archaeological Authority, for the purposes of Clause 2(1)(a) and (b) of Schedule 8 of the FTAA.

1.4 Landowner consent

The Crown does not currently own, and NZTA does not have landowner approval for, all land within the Proposed Designation. The necessary property interests, rights of access or landowner agreements will be obtained progressively through the land requirement and property acquisition process.

The Archaeological Authorities may be granted before those interests are obtained but will not be exercised on any land until NZTA has the necessary rights of access, landowner consent or property interest. This will allow archaeological investigations and Project Works to proceed progressively as access to the relevant land is secured.

1.5 Additional information in support of the Archaeological Authorities

An Archaeological Assessment has been prepared by CFG Heritage to support the Archaeological Authority applications (**Volume D – Appendix A**). The assessment describes the archaeological and historic heritage context of the Project area, identifies recorded archaeological sites and areas of archaeological potential, assesses the potential effects of the Project on archaeological values, and recommends measures for managing those effects.

The assessment draws on desktop research, field assessment, previous archaeological investigations undertaken within Tauriko West and the wider Tauranga area, and predictive assessment based on landscape characteristics and known archaeological patterns. It concludes that recorded sites are unlikely to represent the full extent of archaeological material within the Proposed Designation boundary, and that additional subsurface archaeological remains are likely to be present beyond recorded site locations.

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A review of relevant planning and heritage information has also been undertaken. No QEII covenants, heritage orders or New Zealand Heritage List / Rārangi Kōrero entries have been identified within the Proposed Designation that alter the scope of the Archaeological Authorities sought. Similarly, there are no relevant district plan heritage and archaeological notations within the Proposed Designation.

1.5.1 Past Archaeological Authorities granted

A number of archaeological authorities have previously been granted within or near the Project area, including authorities associated with Route K / Takitimu Drive, the TBE development, Tauriko West Enabling Works (Redwood Lane, the Northern Access / Cambridge Road works) and the Ōmanawa Bridge replacement.

The Archaeological Assessment identifies the following recent authorities of particular relevance to the Project:

- HNZPT Authority 2023/545, for works around Redwood Lane and SH29, including the Redwood Lane/SH29 Corridor Improvements and Tauriko Enabling Works;
- HNZPT Authority 2024/245, for northern access works around SH29 and Cambridge Road;
- HNZPT Authority 2025/472, for works around Ōmanawa Road and the Ōmanawa Bridge replacement;
- HNZPT Authority 2021/797, under which U14/2361, known as “Fitzy’s Hill”, was investigated for the TBE; and
- Other earlier authorities associated with Route K/Takitimu Drive, the TBE investigations and works within the Tauriko West UGA.

These authorities and investigations inform the understanding of archaeological values within the Project area and identify areas that have already been investigated or managed under existing authorities. Although known archaeological sites within some of these areas have previously been investigated, the Archaeological Authorities sought for the Project also extend across that land to provide for any further archaeological material that may be encountered during Project Works.

1.6 Archaeological sites

The archaeological and heritage context is described in Volume A – Section 2.6 and the Archaeological Assessment in **Volume D – Appendix A**. Seventeen recorded archaeological sites are located within the Proposed Designation, including pit and midden sites, fire and oven features, kūmara storage pits and terrace features. Some have already been investigated or are being managed under existing archaeological authorities. The remaining recorded sites, together with any unrecorded archaeological material within the Proposed Designation, are proposed to be managed under the Archaeological Authorities sought for the Project.

The Archaeological Assessment also identifies areas of high archaeological risk within the Proposed Designation (see **Figure 1**). These areas generally relate to high, level landforms where subsurface archaeological features, particularly kūmara storage pits and associated features, are more likely to survive despite the absence of visible surface evidence.

The remaining areas within the Proposed Designation will still be subject to Archaeological Authority coverage because unidentified archaeological material may be encountered during earthworks, but the high-risk areas will be subject to the more targeted management approach set out in the AMP.

The archaeological values of the Project area are therefore principally associated with subsurface archaeological deposits, particularly storage pit complexes associated with horticultural activity, its contribution to the wider Tauriko archaeological landscape, and the potential for archaeological investigation to further understanding of settlement patterns and land use in the western Bay of Plenty.

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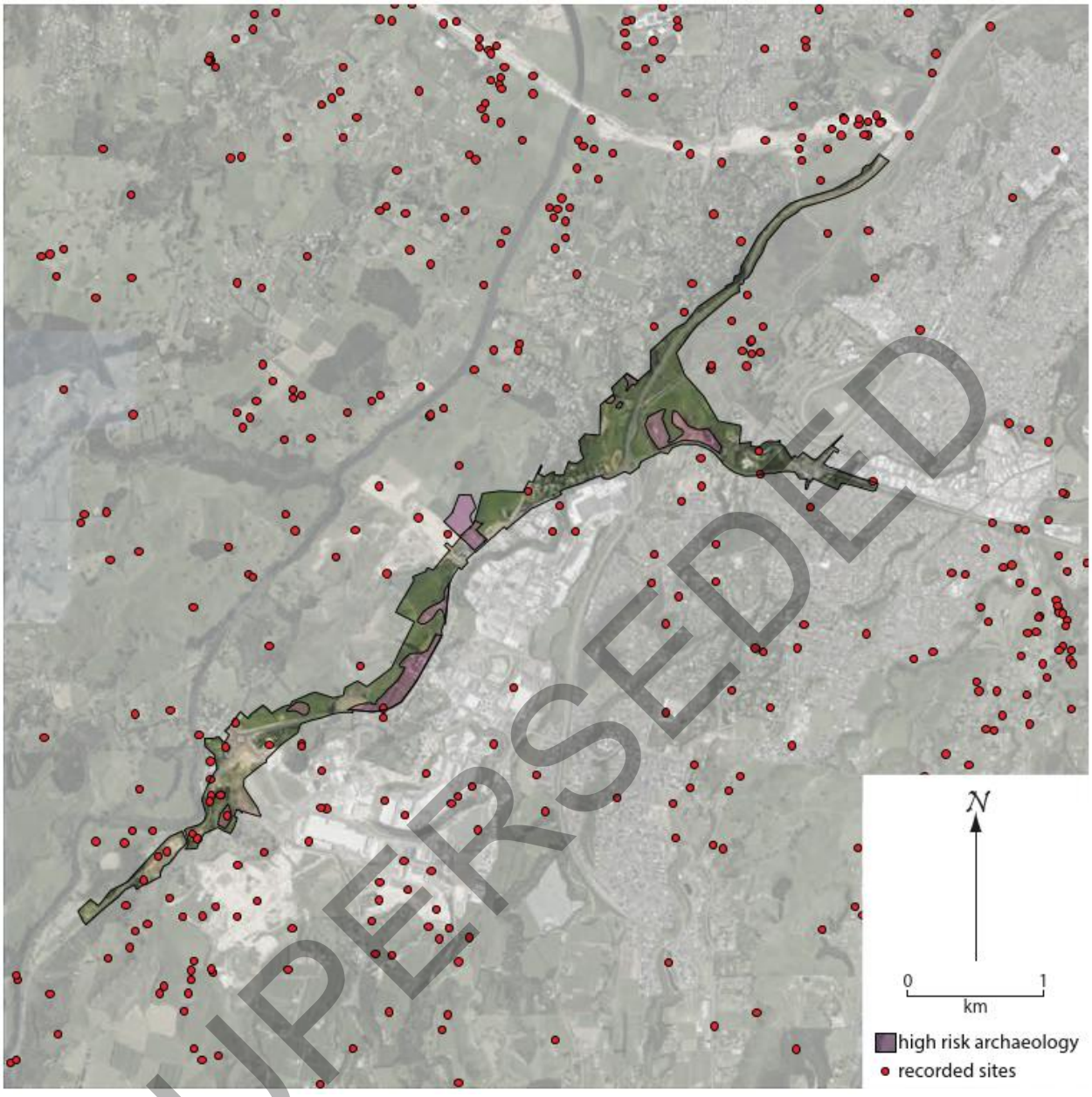
Figure 1: Area of high archaeological risk within the designation boundaries



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1.7 Proposed activities

The purpose of the proposed activity is to enable the construction of the Project. Project Works will require vegetation clearance, topsoil stripping, earthworks and other land disturbance within areas that contain, or may contain, archaeological sites or features.

The Archaeological Authorities are required to authorise the modification or destruction of identified and unidentified archaeological sites and to enable archaeological investigation, monitoring, recording, sampling, analysis and reporting before and during those works.

1.8 Values and effects on values

The archaeological values and potential effects of the Project on those values are assessed in the Archaeological Assessment. That assessment should be read together with Section 2.6 of Volume A, which describes the archaeological and heritage context for the Project, and Section 1.9.6 of Volume B, which assesses the actual and potential archaeological and historic heritage effects of the Project.

As assessed in Section 1.9.6 of Volume B, archaeological effects will be construction-related and permanent. They will arise from earthworks and other ground disturbance that may modify, damage or destroy recorded or unrecorded archaeological sites or features within the Project extent. No operational archaeological effects are anticipated once construction is complete.

The Project has been designed to avoid direct effects on key known heritage features where practicable, including Puketoromiro Pā, which is located immediately adjacent to the Proposed Designation near Takitimu Drive. Where archaeological effects cannot be avoided, they will be managed through the Archaeological Authorities and the AMP and Research Strategy.

On this basis and having regard to the Archaeological Assessment and the effects assessment in Section 1.9.6 of Volume B, adverse effects on archaeological and historic heritage values are considered capable of being appropriately managed through the Archaeological Authorities and proposed conditions.

1.9 Consultation

Consultation and engagement for the Project is described in Section 4 of Volume A. Section 4.2.2 specifically describes engagement with HNZPT in relation to archaeological matters and the Archaeological Authorities sought for the Project. HNZPT was kept informed through the provision of CAF meeting minutes and relevant Project information, and separate discussions were held regarding the Archaeological Assessment, the number and scope of the authority applications, the proposed archaeological management measures and the draft conditions. Feedback received from HNZPT has been considered and, where appropriate, incorporated into the Application. In particular, in response to HNZPT's concern regarding potential further modification of the landform adjacent to Puketoromiro Pā, a condition is proposed preventing further cutting, excavation or removal from the existing benching profile adjacent to the pā.

Engagement has also been undertaken with relevant hapū (Ngāi Tamarāwaho, Ngāti Hangarau and Ngāti Kahu) through Tupenga in relation to archaeological matters as part of the broader engagement process for the Project. That engagement has included discussions and the sharing of the Archaeological Assessment, the AMP and Research Strategy and the proposed archaeological conditions.

Hapū have expressed a desire to be involved in cultural monitoring during earthworks and where incidental discoveries occur. This involvement is reflected in the AMP, including procedures relating to tikanga, kōiwi tangata, taonga tūturu and archaeological discoveries.

1.10 Assessment criteria

Schedule 8 of the FTAA sets out the matters relevant to the Panel's consideration of the Archaeological Authorities. In considering whether to grant the Archaeological Authorities, the Panel must take into account the purpose of the FTAA, giving that matter the greatest weight, together with the relevant matters under the HNZPTA and any relevant statement of general policy.

Table 1 below provides an assessment of the Archaeological Authorities against those matters.

Table 1: Assessment against Schedule 8 matters

FTAA Requirement	Response
Purpose of the FTAA	• Granting the Archaeological Authorities will support delivery of the Project, which is a listed project under the FTAA and has significant national and regional benefits as described in Volume A (Section 1.7) of this SAR. • The authorities are necessary because Project Works will, or may, modify or destroy identified and unidentified archaeological sites within the Proposed Designation boundary.
Historical and cultural heritage value of the archaeological sites and any other factors justifying protection	• The Project area forms part of the wider Tauriko archaeological landscape, which includes evidence of pre-European Māori occupation, horticultural activity and later historic land use. • Recorded and potential archaeological sites within the Proposed Designation have heritage value, particularly for understanding settlement patterns, storage pit complexes, horticultural activity and land use in the western Bay of Plenty.

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Table 1: Assessment against Schedule 8 matters

FTAA Requirement	Response
Purpose and principles of the HNZPTA	• The Archaeological Authorities will provide a lawful and structured process for managing archaeological effects. The proposed conditions and AMP will provide for investigation, recording, analysis and reporting in accordance with accepted archaeological practice, while also recognising the role of mana whenua in relation to tikanga, kōiwi tangata, taonga tūturu and cultural values.
Extent to which protection of the sites prevents or restricts lawful use	• The Project requires extensive earthworks and other ground disturbance. Full in situ protection of all archaeological material within the Proposed Designation would mean that the Project cannot be delivered. • Avoidance has been adopted where practicable, including in relation to Puketoromiro Pā, but archaeological investigation and recording is the appropriate management response where effects cannot be avoided.
Interests of any person directly affected	• The primary affected interests include hapū and landowners. Engagement with hapū and HNZPT is described in Volume A – Section 4 of this SAR, including Section 4.2.2 in relation to HNZPT. • Landowner interests are addressed through the land requirement, access and acquisition processes, and the Archaeological Authorities will only be exercised where NZTA has the necessary lawful right of access, landowner consent or property interest.
Any relevant statutory acknowledgement	• Relevant statutory acknowledgements, if any, are addressed in Volume A – Section 4 of this SAR. No specific statutory acknowledgement has been identified.
Relationship of Māori with ancestral lands, water, sites and taonga	• The Project area forms part of a long-occupied Māori cultural landscape. The Archaeological Assessment does not assess Māori cultural values, which are matters for hapū. Those values are addressed through engagement with hapū and the cultural values material prepared for the Project. The proposed AMP and conditions provide for hapū involvement in archaeological works, tikanga, kōiwi tangata, taonga tūturu and discovery procedures.
Whether the effects are no more than minor	• The Project will, or may, permanently modify or destroy recorded and unrecorded archaeological sites and material within areas of ground disturbance. Given the extent of the Project and the likelihood that subsurface archaeological remains are present, those effects cannot necessarily be characterised as no more than minor. • Direct effects on Puketoromiro Pā have been avoided. Where other archaeological effects cannot be avoided, the Archaeological Authorities, AMP and Research Strategy will provide for investigation, recording, sampling, analysis and reporting before and during Project Works. This will ensure that archaeological information is recovered and preserved through record, and that the effects are appropriately managed in accordance with accepted archaeological practice.
Significance of the sites and extent of modification or destruction	• Recorded and potential archaeological sites within the Project area are characteristic of the wider Tauriko archaeological landscape, particularly pit complexes, middens and associated horticultural features. The exact extent of unidentified subsurface archaeology is not known, and archaeological material may be modified or destroyed where encountered. The proposed archaeological investigation and recording programme will contribute to the understanding of the wider Tauriko archaeological landscape.
Any relevant statement of general policy under the HNZPTA	• No relevant statement of general policy has been identified as applicable to the Archaeological Authorities sought for the Project.

Overall, the Archaeological Authorities are considered to satisfy the relevant assessment criteria in Schedule 8 of the FTAA.

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1.11 Proposed conditions

Proposed Archaeological Authority conditions are included in **Volume D – Appendix D**.

The proposed conditions are based on HNZPT's standard archaeological authority conditions, with amendments to reflect the scale, duration and construction sequencing of the Project and to avoid duplicating matters addressed in the AMP and Research Strategy.

The proposed conditions address the following matters:

a) Notification to HNZPT and Ngāti Kahu, Ngāti Hangarau and Ngāi Tamarāwaho before archaeological works commence;
b) Implementation of the approved AMP and Research Strategy;
c) Confirmation of the relevant landowner's written consent before archaeological works commence on that land;
d) Compliance with any tikanga Māori protocols agreed between NZTA and Ngāti Kahu, Ngāti Hangarau and Ngāi Tamarāwaho;
e) Monitoring of earthworks that will, or are likely to, affect an archaeological site by the section 45 of the Act as the approved person, or a person appointed on their behalf;
f) Annual reporting to HNZPT during any year in which Project works are occurring;
g) Notification to HNZPT and the relevant hapū when archaeological works are complete; and
h) Interim and final archaeological reporting, including the updating or preparation of NZAA site records and provision of reports to HNZPT, tangata whenua and the NZAA Central Filekeeper.

The conditions also provide for archaeological reporting and close-out to occur progressively where on-site archaeological work is completed across different parts of the Project.

The proposed conditions align with the condition-making powers in Schedule 8 of the FTAA and provide an appropriate framework for implementing the approved AMP, undertaking archaeological monitoring and recording, involving HNZPT and hapū, and reporting the results of archaeological investigations.

1.12 Conclusion

In considering the Archaeological Authorities, the Panel must give greatest weight to the purpose of the FTAA, before considering the relevant HNZPTA matters and proposed conditions. Those matters are addressed in Section 1.10 above.

NZTA seeks that the Panel:

(a) Grants the three Archaeological Authorities sought under section 42(4)(i) and Schedule 8 of the FTAA, subject to the proposed conditions in **Volume D – Appendix D**;

(b) Approves the AMP and Research Strategy in **Volume D – Appendix B** as the framework for managing archaeological effects and undertaking the archaeological investigations authorised by the Archaeological Authorities; and

(c) Approves Mr Matthew Campbell as the person authorised to undertake, or direct, the archaeological activities covered by the Archaeological Authorities.

The Archaeological Authorities and associated approvals are necessary to enable Project Works that will, or may, modify or destroy identified and unidentified archaeological sites within the Proposed Designation.

The Archaeological Assessment concludes that those effects can be appropriately managed through the approved AMP and Research Strategy, the proposed conditions, accepted archaeological practice, and the involvement of HNZPT and Ngāti Kahu, Ngāti Hangarau and Ngāi Tamarāwaho.

On this basis, the Archaeological Authorities and associated approvals are appropriate and should be granted.

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