

Archaeological assessment of effects (desktop)

Southern Links 1 - Industrial Development



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Summary

Redox Cultural Heritage Services Ltd (RCHS) has been commissioned to compile this desktop based Archaeological Assessment of Effects to support the substantive application for the Southern Links 1 project (SL1 or the Project) under the Fast-track Approvals Act 2024 (FTAA). This report relates to the industrial portion of SL1, referred to as the Industrial Area and the Industrial Development in this report.

The Project (SL1 Industrial) is located in Frankton, Hamilton, affects land parcels: Lot 1 DP 365434, Lot 1 DP 372217, Lot 1 DP 396081, Lot 1 DP 486522, Lot 1 DP 584573, Lot 1 DP 603134, Lot 1 DPS 59491 & Lot 2 DP 603134. The area affected is referred collectively in this assessment as the Site; it includes 22 industrial lots, across 60ha site.

The Site has been subject to background desktop study to identify the potential for archaeological sites, features or deposits whether they be recorded or unrecorded within the Site. This review includes any, relevant, available historic documents, aerial imagery, historic maps, archaeological reports and archaeological site data held in the New Zealand Archaeological Association database, ArchSite.

Results from the desktop research did not identify any recorded sites nor any potential for unrecorded archaeology within the Site. Since there are no known archaeological values, there can be no effects on these by the Industrial Development. It is recommended that the Industrial Development proceed under an approved Accidental Discovery Protocol in the unlikely event that anything is found.

Mana Whenua should also be consulted at an early stage of the Project regarding this assessment, the conclusions reached and the cultural effects of the proposed development which can differ from archaeological effects.

Introduction

The application proposes to undertake a development called Southern Links 1 (SL1 or the Project) in Frankton, Hamilton (Figure 1). The Project includes Industrial Development in the northern part of the Site and Residential Development in the southern part of the Site. The focus of this assessment is the Industrial Development.

The Southern Links 1 project is a combined 106ha development, including residential and industrial activities. The industrial component comprises circa 60ha and is in joint landownership and is currently used for a mix of rural and related activities. A desktop review/study of the Industrial Area and surrounding locality has been undertaken. This study included a review of the recorded archaeological landscape, recorded archaeological sites in the vicinity, archaeological reports, historic aerial and LiDAR derived imagery as well as historic maps.

The desktop review/study identified that there are no known recorded or unrecorded archaeological sites identified within the Industrial Area.

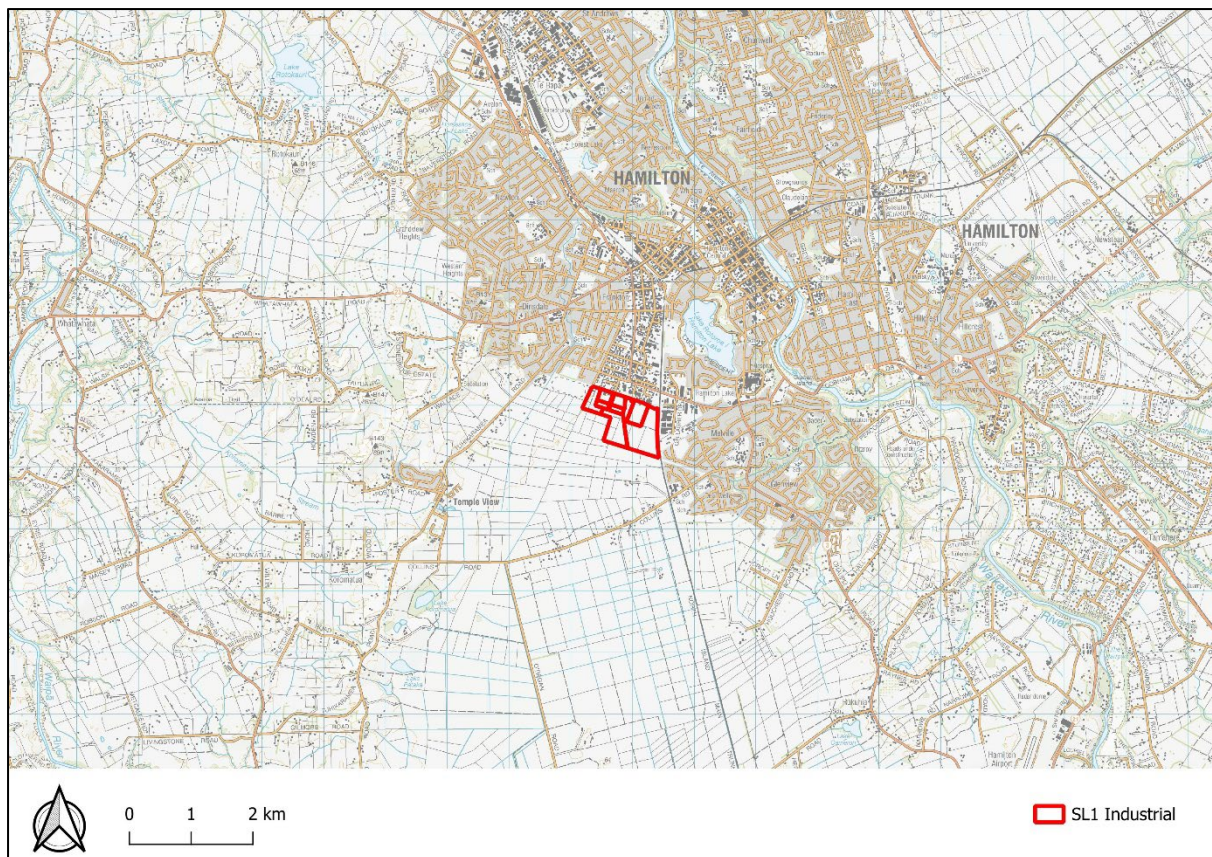


Figure 1. Location for the proposed SL1 Industrial North development (Site) in the wider landscape (Source: LINZ).

Statement of qualification and compliance

I am an archaeologist with circa 25 years' experience. I hold a master's degree in archaeology and am qualified to undertake archaeological work in New Zealand. I have been approved by Heritage New Zealand as a S45 archaeologist for a broad range of projects. I have compiled and submitted many archaeological assessments like the one produced here. This assessment and its conclusions are within my area of expertise.

I can confirm that I have read Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and referred to in the Fast-track Approvals Act 2024: Panel Convenors' Practice and Procedure Guidance. This assessment has been prepared in compliance with that Code.

Statutory context

The Project seeks approval under the Fast-track Approvals Act 2024 (FTAA) which includes seeking consents under the Resource Management Act (RMA). Archaeological historical and cultural sites and landscapes are managed by the RMA its associated District Plans, Regional planning documents, and various national planning/policy documents.

and national levels.

Archaeological sites are also explicitly protected through the archaeological provisions of the Heritage New Zealand/Pouhere Taonga Act (NZHPTA). The HNZPTA prevents archaeological sites from being modified or destroyed without an Authority from Heritage New Zealand (HNZ). It is noted an Authority under the HNZPTA is not being sought in respect of the Project.

The relevant sections of the Waipa District Plan, HNZPTA, and RMA are reproduced below for reference.

Waipa District Plan

The Waipa District Plan sets out objectives, policies, and rules for land use activities and subdivision within the district. Part F of the District Plan relates to Natural and Cultural Heritage and Section 22 includes provisions relating to heritage and archaeology. Relevantly, these include:

22.2 Resource Management Issues

Retaining archaeological heritage

22.2.4 The District's archaeological heritage has not been extensively recorded. Earthworks and the location of buildings in the District present an ongoing challenge to the protection and retention of archaeological heritage. This may result in sites being discovered accidentally, and/or damaged as part of a development.

Objective – Protection of heritage items

22.3.1: To protect the [District's heritage items](#) from inappropriate [subdivision](#), use and [development](#).

Objective – Protecting archaeological heritage

22.3.4: To maintain the archaeological heritage of the [District](#).

Policy – Management of effects on Archeological Sites

22.3.4.1: To manage effects on [archaeological sites](#) at the time of [development](#) and [subdivision](#).

Heritage New Zealand Pouhere Taonga Act 2014

The HNZPTA 2014 provides blanket protection to all archaeological sites that meet the definition in section 6 of the HNZTPA, whether they are recorded or not. Protection and management of sites is managed by the archaeological authority process, administered by HNZ. Archaeological sites must not be destroyed or modified without an authority to do so from HNZ (section 42).

The HNZPTA 2014 (s6) defines an archaeological site as:

(a) Any place in New Zealand including any building or structure (or part of a building or structure) that:

(i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where that wreck occurred before 1900; and

(ii) provides, or may provide through investigation by archaeological methods, evidence relating to the history of New Zealand; and

(b) Includes a site for which a declaration is made under Section 43(1) of the Act¹.

The HNZPTA sets out a process for a person who intends to carry out work that may modify or destroy an archaeological site, or to investigate an archaeological site using invasive archaeological techniques, to obtain an authority from HNZ. The process applies to sites on land of all tenure including private, public and designated land. The HNZPTA also contains penalties for unauthorised site damage (Part 5, subpart 1).

The Resource Management Act 1991

The RMA identifies the protection of historic heritage from inappropriate subdivision, use, and development as a matter of national importance (section 6(f)).

Historic heritage is defined in section 2 as:

(a) means those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:

(i) archaeological,

(j) architectural,

(k) cultural,

¹ Such declarations usually pertain to important post-1900 remains with archaeological values.

- (l) historic,
 - (m) scientific,
 - (n) technological qualities; and
- (b) includes:
- (i) historic sites, structures, places, and areas;
 - (ii) archaeological sites; and
 - (iii) sites of significance to Māori, including wahi tapu; and
 - (iv) surroundings associated with the natural and physical resources.

These categories are not exclusive, and some archaeological sites may include above ground structures or may also be places that are of significance to Māori.

Where resource consent is required for any activity the assessment of effects is required to address cultural and historic heritage matters (RMA Schedule 4).

Project scope

The Industrial Development is part of the wider SL1 Project which involves the subdivision and development of approximately 106 hectares of land. The Industrial Development is to occur in the northern part of the SL1 Site (the Industrial Area) is proposed as a purely industrial development (refer to the Masterplan at Figure 2).

The SL1 Industrial North development forms part of the industrial component of Southern Links 1, a listed project under FTAA 2024. The Southern Links 1 project is a combined 106ha development, including residential and industrial activities. The industrial component comprises circa 60ha and is in joint landownership and is currently used for a mix of rural and related activities. The landholding includes four parcels Lot 2 Deposited Plan 603134, Lot 1 Deposited Plan 603134 both within Southpark Agri Development Limited landholdings (circa 50ha), and Lot 1 Deposited Plan 584573 Industrie Property Tahi Limited and S&S Property Investments Limited (7.8ha) and Lot 1 Deposited Plan 396081 and Lot 1 Deposited Plan 486522 within Industrie Property Tahi Limited landholding (2.1ha).

The proposal seeks approval for a Substantive Application under the Fast-Track Approvals Act 2024 for a comprehensively master planned and staged industrial development. This includes all necessary resource consents under the Resource Management Act 1991, including regional, district approvals where required.

The industrial component provides for the establishment of 60ha gross developable industrial land, together with associated infrastructure and services, including roading and associated stormwater ponds. The proposed industrial development is underpinned by a series of design principles, with a focus on creating a functional, efficient and contiguous industrial development that underscores the locational attributes of SL1 Growth Cell, the Hamilton Southern Links designation and future industrial growth. An integrated roading network which connects to both existing and planned infrastructure underpins this approach.

The 22 serviced industrial lots vary in size and attributes to support a range of industrial uses, none of which are heavy or noxious. A truck and logistics activity is proposed on lot 7 to facilitate the landowners existing national trucking operation. All other industrial lots are sized to support a range of anticipated and provided for industrial activities, underpinned by bulk and location controls.

The proposal includes substantial enabling works to establish developable land, including bulk earthworks across the site and necessary pre-load to manage ground conditions. An integrated stormwater management system including wetlands, detention/attenuation devices and treatment ponds supports the development.

Access and integration with the surrounding Hamilton area is provided through connected transport framework, including the establishment of intersections, roading, and walking and cycle networks, along with upgrades to existing transport infrastructure. The industrial development is proposed to be serviced via a coordinated strategy, including the extension of public networks, upgrades, and installation of appropriate infrastructure.

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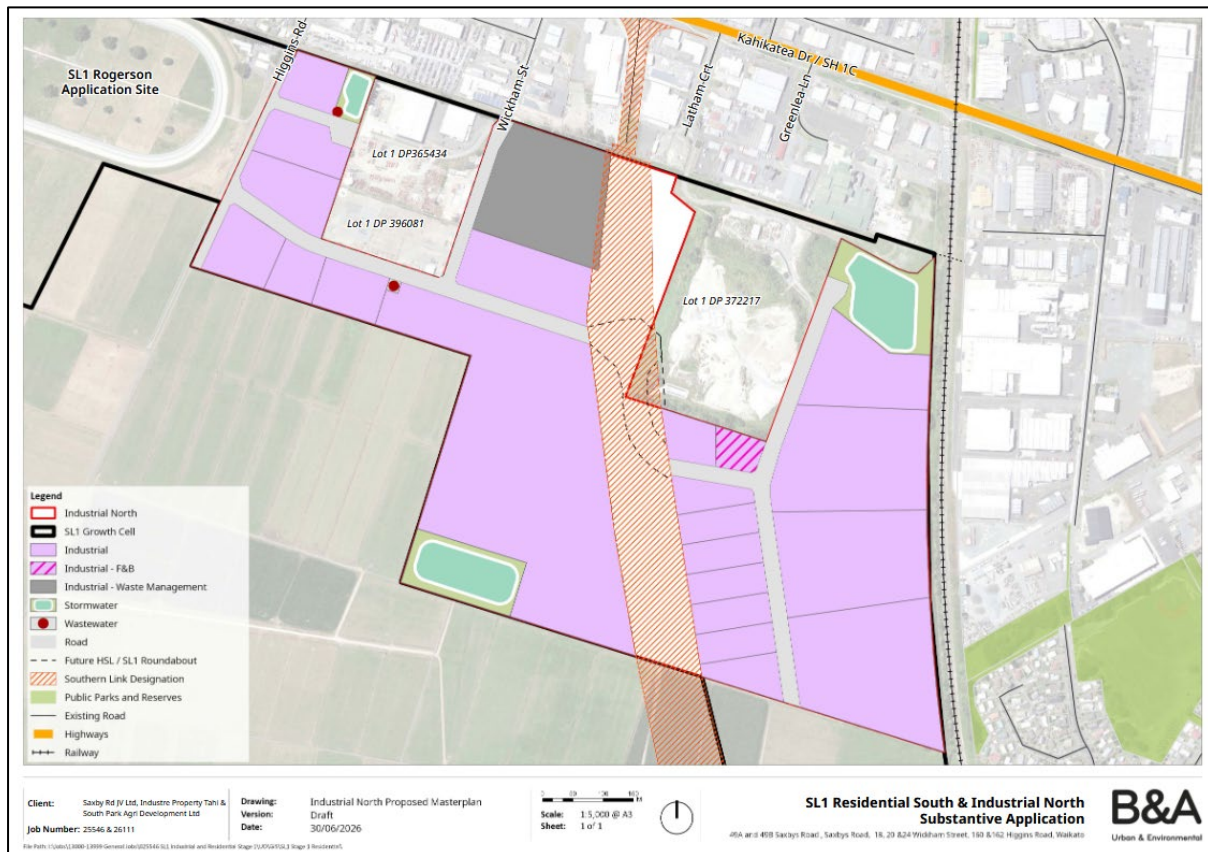


Figure 2. Proposed SL1 Industrial North Masterplan (Site) (B&A Urban & Environmental).

Geology of the Middle Waikato Basin

Please note that this section is generally similar to that of the Archaeological Assessment of Effects (desktop) Southern Links 1 Residential Development.

The Industrial Area (and indeed the entire SL1 site) is located within the Hamilton Basin. The Hamilton Basin features diverse landscapes and soils shaped by geological and climatic processes over thousands of years. It is characterised by four main landscape units: low rolling hills, alluvial plains, low terraces, and gullies; evolving over more than a million years, with significant geological deposits from volcanic activity (Figures 3–4).

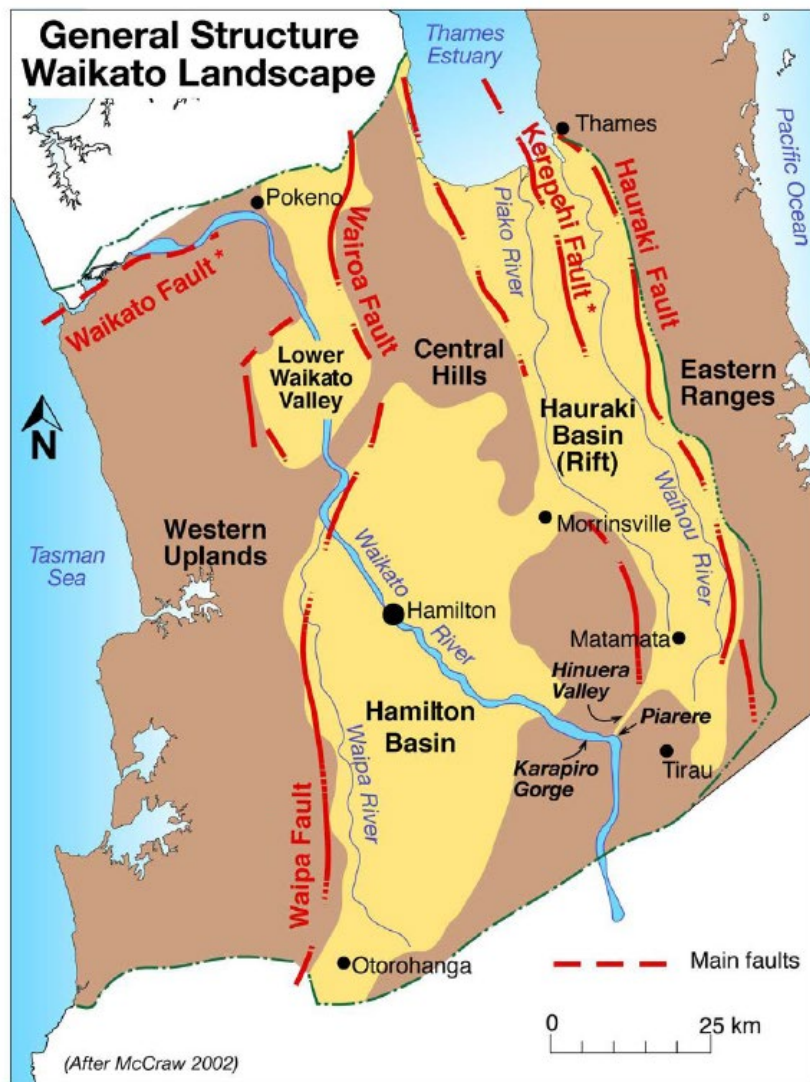


Figure 3. Map from Lowe (2010) showing the Hamilton Basin.

The Hinuera Formation, consisting of volcanogenic alluvium, is a key feature of this landscape with material forming it through deposition over the last 20,000 years. A key factor in the formation of this landscape is the Waikato River which has changed the landscape through sediment deposition and river migration before its more recent entrenchment.

Both the Waikato River, Oranui eruption and Taupo pumice alluvium (Hatepe Eruption) have caused significant changes to the landscape of the middle Waikato basin, shaping the modern environment (Figure 4). During the last one hundred millennia a meandering braided Waikato River has both eroded and deposited sediment across the landscape. This has transformed the landscape into a rolling somewhat flattened environment made up of gently rolling hills composed of raised levees and depressed swales and lower swamps and lakes. After the Oranui eruption the Waikato was forced to change course being redirected away from the Firth of Thames into the Waikato basin, and finally through to its current outlet at Port Waikato (deposition occurred between 23,500–17,000 years BP, with the river beginning to entrench in its modern channel around 17,500 BP) (Lowe 2010). The Waikato's high energy braided river system distributed sediment across the Hamilton Basin in various thicknesses and consistencies. This landscape, represented as a braided fan, has now been classified as the Hinuera surface, an accumulation/sequence of deposited tephras since the rivers' entrenchment (Lowe 2010: 5; McLeod 1984:2).

After the river's final course had settled into the current alignment an eruption at Hatepe (c. 1800 BP) directed a lahar flow down the river (Taupo pumice alluvium-TPA). This created, through erosion and deposition, a series of new river terraces along the banks of the river, which are still visible today (Lowe 2010). Aside from natural modification humans have also significantly modified this landscape.

Within the Hamilton Basin soil types reflect a diverse landscape and soil parent materials, have varying and distinct drainage characteristics. These soil classification units can be divided into differing qualities from volcanic ash, weathering, and soils that have been modified by humans. Well-drained soils usually lie on raised deposits and less freely draining to poorly drained soils in lower down in swales. For the Hamilton Basin key soil series include Horotiu (well-drained), Bruntwood (moderately well-drained), and Te Kowhai (poorly drained). These soil types have direct importance/correlation to archaeology, especially horticulture, and the likelihood for sites. Solis are primarily formed from volcanic ash and alluvium, with varying clay types. Tamahere soils (man made) have also been identified in soil maps. These are anthropogenic and are modified soils used for agriculture, particularly the growing of tubers, such as, kumara (Lowe 2010).

From the effects of climate changes and the recent influx of humans the Basin has undergone significant changes from climatic shifts and human activity. Studies indicate that the original shrubland-grassland changed successively to a broadleaf-podocarp forest circa 17,500 years ago. During the influx of Māori into inner New Zealand deforestation and agricultural practices impacted the environment significantly in a relatively short period of time; this was exacerbated with the later influx of Europeans. As a result of deforestation and climate changes, sedimentation led to the additional formation of lakes and peat bogs (Lowe 2010).

Main soil types within the Hamilton Basin include a variety of parent materials and how they are situated in the landscape (Figure 4). Low rolling hills include Hamilton, Kainui, and Ohaupo series, characterized by weathered tephra and clay-rich profiles. Plains soils such as Horotiu, Bruntwood, and Te Kowhai series exhibit varying drainage and clay types, influenced by alluvial deposits. Low terrace soils, primarily Waikato series, are weakly developed due to their young age from recent flood deposits. Gully soils include Tamahana and Kirikiriroa series, formed from recent sediment and colluvium. Horotiu soil is classified as Typic Orthic Allophanic Soils, indicating its tephric and mixed rhyolitic composition. Te Kowhai soil profile presents a contrasting structure and composition compared to Horotiu soil. It is classified as Acidic Orthic Gley Soils, reflecting its tephric and rhyolitic nature. As mentioned above there are also large areas of organic soils from former peat swamps which have now been drained in the modern era (Lowe 2010).

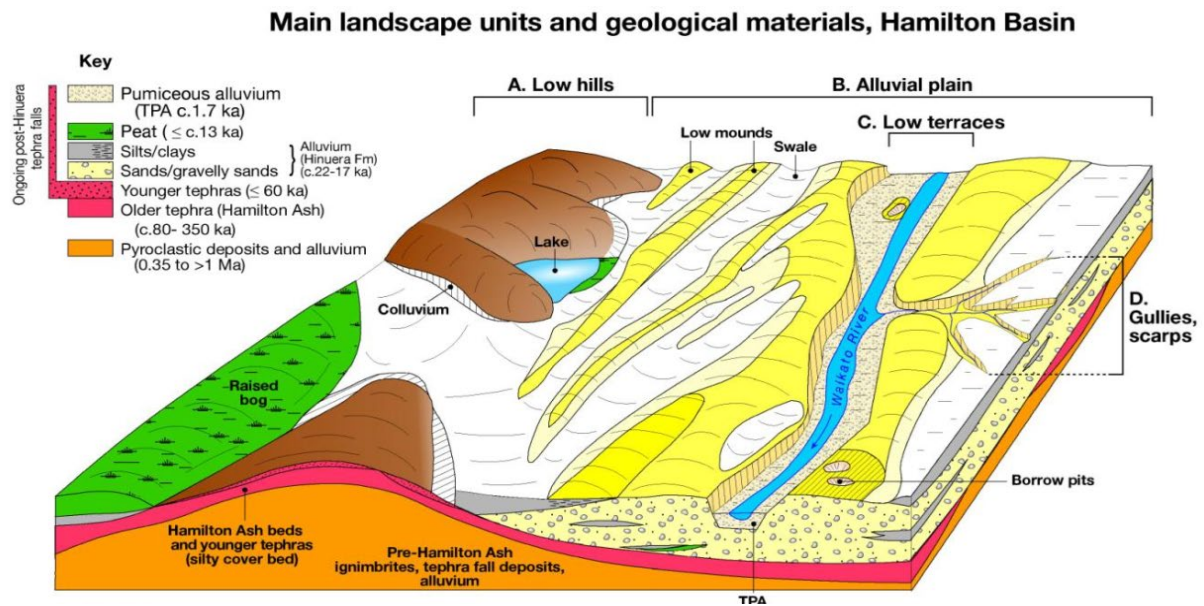


Figure 4. Block diagram showing the principal landform units of the Hamilton Basin (Lowe 2010:4).

Local environment

The Site as mentioned above is located within the Hamilton Basin. This landscape has been dominated by the meandering Waikato River, which now entrenched in its current alignment, flows approximately 2 kilometres northeast of the Site. Landform comprises flat lowland (former swamp) with paleochannels and levees. Some of the Site is located on small raised antecedent ridges/hills. Soil classifications/orders within the Site are identified in soil maps as Organic – (Green) on the lower areas and Allophanic – porous with a low-density structure (Yellow), Granular – clayey soils from weathering of volcanic rocks or ash (Purple) and Brown (moderately free draining soils with clay (Brown) on the elevated areas and slopes. Drainage classes are identified as Rukuhia (1 – very poorly drained, Pink). According to Soils maps most soils are defined as poorly draining soils and as such have a much lower potential for horticultural sites and pre-European archaeology (Figures 5–6). The elevated areas with Allophanic, Granular and Brown soils should be more freely draining, these possibly have a higher potential.



Figure 5. Soil classification (LRIS, S-Map online).



Figure 6. Soil drainage (LRIS, S-Map Online).

Recorded archaeology in the vicinity of the Industrial Area

There are no recorded archaeological sites within the Industrial Area with the closest recorded archaeological sites more than one kilometre from the Site: S14/498 – Frankton Junction Railway Station (1 km), S14/223 – Lake house (1 km), S14/102 – flour mill (1.74 km) and Māori horticultural sites and pā following the Waikato River (more than 2 km) (Figure 7).

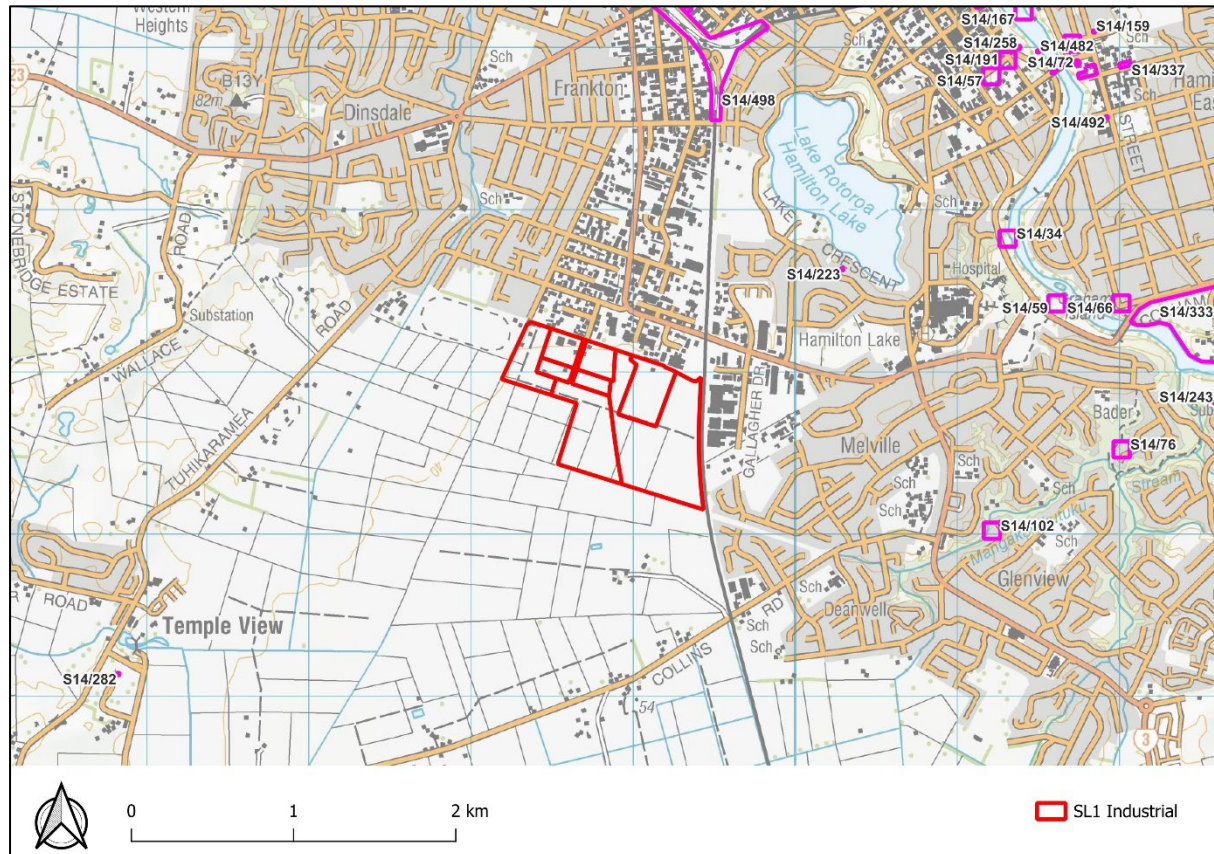


Figure 7. Recorded archaeological sites in the general vicinity of the Site, taken from the NZAA database Archsite in October 2025 (ArchSite).

A Māori horticultural/agricultural landscape along the river corridor identified in soil maps (Grange 1939) and more modern research by Gumbley and Hutchinson in 2012–3 have identified multiple archaeological sites. Archaeological sites were recorded using soil maps and 1930s – 1940s aerial images; shown by the presence of borrow pits and Tamahere soil (Gumbley & Hutchinson 2013). Neither the soil maps nor work by Gumbley and Hutchinson have identified any horticultural soils or archaeological sites relating to this landscape within the Industrial Area. The Industrial Area is considered too far from the river for this site type.

The New Zealand Heritage List/Rārangī Kōrero

No heritage sites are identified on the list within or in the immediate vicinity of the Industrial Area.

Historical Background to the site and surrounding area

The following historical documentation is largely similar to that in the Archaeological Assessment of Effects (desktop) Southern Links 1 Residential Development.

Māori

Today the Waikato is a much-altered landscape from what it once was. Its swamps have been drained and vegetation cleared to create pasture and exotic forests. However, features of the landscape, especially those used by Māori for identity remain, for example the sentinel mountains – Taupiri, Karioi, Pirongia, Kakepuku, Maungatautari, Maungakawa, Te Tāpui and Te Aroha, and the Waikato River. Major rivers in the Waikato were initially used for transport and the inland diaspora of Māori as well as European trade and transport. These rivers and their tributaries flow through some of the most productive land in New Zealand.

Waikato is the ancestral region of tribes descended from people who came to New Zealand on the *Tainui* waka. The waka, commanded by Hoturoa, explored both coasts of the central North Island before making its final landfall at Kāwhia Harbour, settling there first there first, before spreading to the north, east and south. In later generations, Tainui ancestors founded tribes which spread throughout and beyond the Waikato region. For the Tainui tribes, the harbours, rivers and swamps of Waikato provided food and other resources, and its mountains and ranges were strongholds. Settlements sprang up throughout the region, usually on hilltops or beside lakes. Harbours were traditional centres of population, as were mountains such as Maungatautari. As waka traffic increased along the rivers during the 1800s, settlements in these areas increased (Swarbrick 2025).

After the initial occupation of coastal New Zealand, the Māori diaspora led inland towards the Middle Waikato Basin. To access the Waikato, navigable waterways and accessible land were used to locate suitable areas for horticulture and occupation; evidenced by the plethora of recorded archaeological sites along the Waikato River, its tributaries and gully systems. Recorded archaeological sites within this landscape are a combination of defensive structures; established at higher elevations to provide a watershed of the area. Pā are also closely linked with surrounding settlements and gardens, utilising the fertile soils adjacent to the river for the cultivation of kumara and other plant species (Gainsford 2025, O'Hagan 2025).

Following the signing of the Treaty of Waitangi in 1840, there was increased pressure on Māori by Europeans to sell their land. As a reaction to increasing European pressure some chiefs decided to unite and stave off the threat to both land, customs and mana. The Government responded by planning an invasion into the Waikato, leading to the wars of the 1860s. Governor George Grey had accused the Waikato chiefs of disloyalty. And following this he announced his intention to send troops into Waikato on 11 July 1863. A result of the Waikato Wars was that most Māori owned land was confiscated under the NZ Settlements Act (NZSA) 1863 (Swarbrick 2025).

European

Following the first European settlers (traders and missionaries) more permanent Europeans were soldiers who were guarding militia townships, for example, Cambridge. As the war was

being fought, the government planned to confiscate Waikato lands and establish defended townships to deter Māori from reoccupying their territory. Settlers earmarked for these areas were part of the Waikato militia, consisting of four regiments recruited from Otago and Australia (1863) with the promise of land grants post-service. Following the wars and disestablishment of the militia (1865–66) and formation of the armed constabulary (1867) to guard the confiscation line, many men were released from service. They were granted land in the region that had been confiscated from Māori under the NZSA 1863. However, this land was usually allotted into 50-acre blocks drawn up on survey plans and mostly turned out to be less ideal for agriculture being inaccessible and swampy. Lots of these allotments were either left, on sold or they were cleared, drained for use. Following the close of the war around circa mid-1864 new towns were surveyed at Alexandra (now Pirongia), Cambridge and the former Māori villages of Kihikihi and Kirikiriroa (renamed Hamilton). Also, former military outposts were also settled at Te Awamutu, Ōhaupō, Whatawhata, Huntly and Ngāruawāhia.

During the early influx of European settlers Māori continued as they had since their arrival into the Waikato. Initially the Waikato was not considered favourable by Europeans for farming or cultivation as it was deemed difficult, too swampy and quite inaccessible. Little land changed hands during this period due to its 'unfavourable' nature. However, Māori with newly acquired agricultural skills, tools and modern farming techniques and crop species (introduced often by Missionaries) changed Europeans perceptions. Māori farming and exports became very successful (Phillips 2014). Most likely this success prompted, to a degree, the British invasion of the Waikato (1863) by the Crown. Land acquired was used for European settlers and allotted to militiamen. Following the land wars large tracts of Māori owned land were confiscated and allocated to militiamen. Later this land was often sold by the men since they too thought it too difficult to clear and cultivate. This is the case for the site and the surrounding area around Cambridge and Hamilton whereby land was confiscated to be allotted to militiamen men following service (Gainsford 2025, O'Hagan 2025).

Local history

Prior to the arrival of European settlers to the Waikato River was the major transport route for initial exploration, settlement and burgeoning trade (through the 1850s). These canoes were later replaced by steamers during the British expansion into the region, through the Waikato Wars. Part of this British expansion included the 3rd and 4th Waikato Militia Regiments. As with initial settlement the river was the only major route from Auckland into the Waikato. The first settlers were members of the disestablished 4th Waikato Regiment who settled around 1864–1866. They received a 1-acre town section and were also entered into the ballot for one fifty-acre section or more according to rank/station so that they could commence farming the outlying Hamilton district.

Historic plans and aerials

Historic plans

A review of historic survey plans in Quickmap recognised plans of direct relevance to the Industrial Area. These include: SO 380 which shows the site as covered in swamp (Figure 8), DP 3222 (1904), which shows the site adjacent the Main Trunk Line and divided into lots, and a sketch map by Captain Newell which shows the Industrial Area as swamp. This is further

evidenced in SO 380 whereby the area is encapsulated in an area marked 'Great Swamp'. There is no mention, in any available plan, of this area being allotted as 50-acre blocks to ex-militia. The area has subsequently been drained but there are no visual indications on the plans as to when or how this occurred or what features were constructed (Figures 8–10). The Industrial Area lies adjacent the Main Trunk Line which forms its eastern boundary (constructed during the 1870s–1880s).



Figure 8. Excerpt from SO 380 (1865). The Site is shown as being swamp (Quickmap).

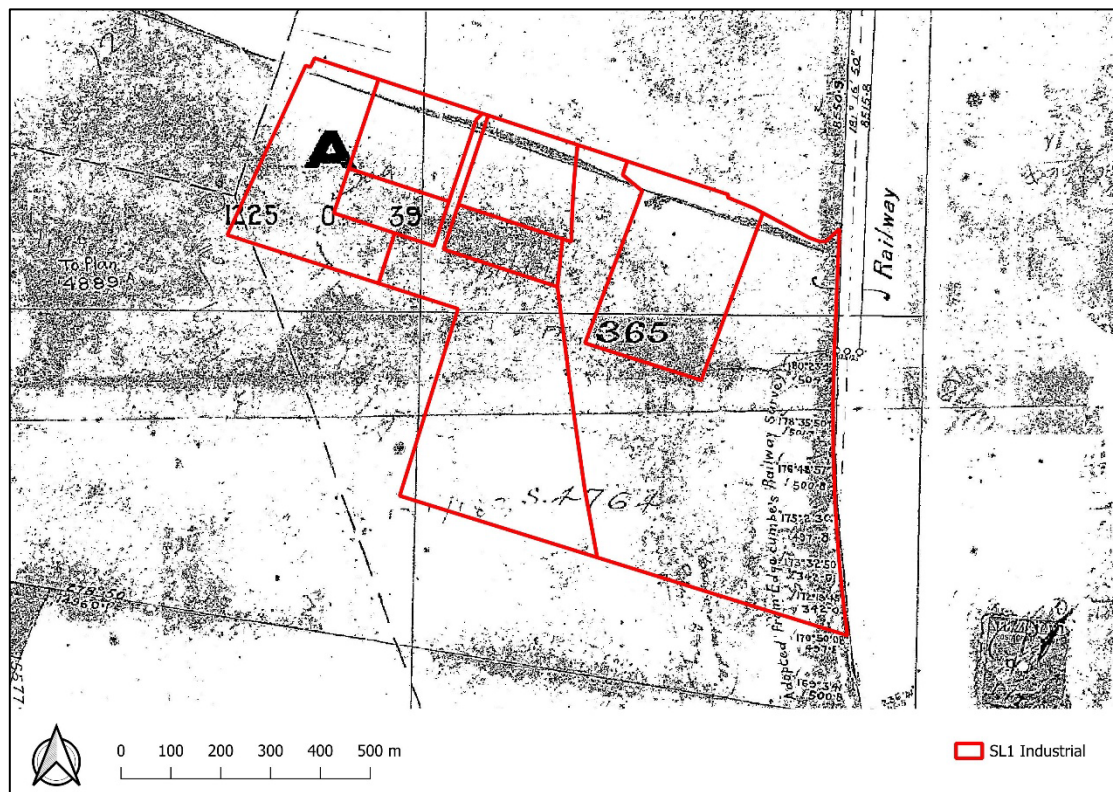


Figure 9. Excerpt from DP 3222 (1904) shows the Site as being divided into lots (Quickmap).



Figure 10. Part of Newall's Sketch Map (Reproduction), 1874. Thought to have been prepared by the military leader Captain Stuart Newall the map shows various sites and features of interest. The map is a sketch and therefore it is not possible to define the exact area for the proposed development, but it has been approximated by the red ellipse through georectification which is approximate (1973/38/4 – Newall's Map: Collection of Te Whare Taonga o Waikato Museum & Gallery).

Historic aerals

Early aerial imagery was reviewed on the website Retrolens. The earliest available images for the Site are from 1943. Aerial images visualise historic land use for the Industrial Area, which has primarily been successive transition from scrubland through to pastoral grazing. This has likely included drainage of the area and the construction of other farm infrastructure, for example, races and fences. Aerials show a landscape has changed even further with the expansion of Hamilton and urbanisation, which has occurred within the areas of higher elevation (1990s onwards). None of the images identified potential for unrecorded archaeology (Figures 11–13).



Figure 11. Excerpt from earliest available aerial photography from 1943 (SN266-831/35 & 36) (Source: Retrolens).



Figure 12. Excerpt from later photography from 1961 (SN3470-4510/12) (Source: Retrolens).



Figure 13. Excerpt from later photography from 1995 (SN9401-C/9) (Source: Retrolens).

LiDAR imagery

Height data shown below provides an elevation model for the landscape and subject area in 2008 and 2023. LiDAR data uses laser points taken from aircraft to create a height elevation model for the landscape and can remove extraneous object such as houses and trees. There is no visible evidence for archaeology within the Industrial Area based on available LiDAR data. Shown in the aerial images combined with the LiDAR the areas of slightly higher elevation have undergone significant modification through increased urbanisation from the middle of the 1990s through to current day (Figures 14–15).



Figure 14. LiDAR excerpt from 2008.



Figure 15. Lidar derived hillshade model from DEM data taken in 2023 that shows the Site as mostly flat with some lower hills to the north (Source: LINZ).

Assessment of Archaeological Values

The Industrial Area is shown as being within an area identified as former swamp (Great Swamp) on early historic survey plans. It is not until the mid-1900s that there is evidence for the land being subdivided, potentially sold and worked. Aerial images show that the Industrial Area, even in the 1940s, was still likely swampy, and covered in scrub. During the late 1800s the railway was constructed; its reserve forms the eastern boundary of the Industrial Area. There are no recorded archaeological sites within the Industrial Area and none of the historic documents reviewed identified any visible unrecorded archaeology within it. As such there are no known archaeological values.

Assessments of effects on archaeological values

Since there have been no identified values there can be no known effects.

Conclusions and recommendations

No recorded or unrecorded archaeology was identified within the Industrial Area through this desktop review. Due to the nature of the landscape (based on historical documentation) and the urbanisation/development within the Site, it is highly unlikely that any archaeology will be encountered during the proposed development.

Recommendations:

1. Even if there is no recorded archaeology or identified potential for unrecorded archaeology there is always the potential to uncover single unexpected finds in the landscape during large scale works. It is therefore recommended that Accidental Discovery Protocols are used for the duration of the Industrial Development. Protocols used, should be those recommended/approved by Heritage New Zealand.
2. Consultation should be undertaken with Mana Whenua at an early stage of the process. The results of this assessment should be discussed in detail so that Mana Whenua are aware of this report and its results and have opportunity to comment on the findings, the Industrial Development and discuss any Authority application.

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