

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:

Downtown Carpark Site Development

Fast-Track application number:

FTAA-2512-1158

BUN60460864, LUC60460865, DIS60460866 and WAT60460867

2.0 Technical Specialist Memo - Archaeology/Historic Heritage

To:

Sarah Wilson – Lead Planner & Adonica Giborees – PPL

From:

Mica Plowman - Principal Heritage Advisor

Qualifications
& Relevant
Experience:

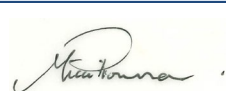
I hold the qualification(s) of: Bachelor of Arts (BA) and Master of Arts (MA) in Anthropology (archaeology) and have 30 years of experience in historic heritage and archaeological resource management under the RMA (Part 2, Section 6 e and f matters) and the HNZPT Act (2014).

I am a full member of the New Zealand Archaeological Association. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications, and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions.

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 conferences, 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:

21/04/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Downtown Carpark Site Development Fast-track Approvals Act Substantive Application 2 Lower Hobson Street, Auckland CBD, Assessment of Environmental Effects and Statutory Analysis*. Prepared for Precinct Properties New Zealand Limited by B & A Urban and Environment, 18 December 2025.
- Appendix 1 Record of Title and Interests
- Appendix 12 Landscape Visual Assessment
- Appendix 14 Draft Construction Management Plan
- Appendix 16 Preliminary Detailed Site Investigation Report
- Appendix 14 Draft Construction Management Plan
- Appendix 24 Proposed Conditions of Consent
- Appendix 34 Archaeological Assessment
- Appendix 35 Draft Archaeological Management Plan

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

The proposed works, as described in the FTAA application and supporting documents, do not affect scheduled archaeological sites in Schedule 14.1 (Schedule of Historic Heritage) in the Auckland Unitary Plan operative in part (February 2026) [AUP OIP]. No consents are required under Chapter D17 Historic Heritage [AUP OIP].

5.0 Specialist Assessment

There are a number of archaeological sites and historic heritage places in close proximity to the project area relating to 19th century development and occupation of Auckland's commercial district. Many of these are scheduled in AUP OIP Schedule 14.1 Schedule of Historic Heritage and/or also listed in the NZ Heritage List/Rārangi Kōrero. These sites are described in detail in the applicant's archaeological assessment. Only the recorded archaeological sites and historic heritage places identified within the application area are discussed in this memo (Attachment 1).

The Archaeological Assessment prepared by Clough and Associates (Appendix 34) identifies that there are three potential historic heritage features affected by the proposed Downtown Carpark development. These include two 19th century European archaeological sites recorded within the project footprint; the 1878 Auckland Graving Dock (R11/3458/CHI 483) and two episodes of reclamation associated with its construction (1878-9) and decommissioning (1915). The third, the Gunston building is an unrecorded 20th century building built in 1912 identified as part of the project archaeological assessment (Attachments 2-5).

Auckland Graving Dock – R11/3458/CHI 483

The issue of planning a graving dock or dry dock for repairing ships in the central city was raised in 1872. Early plans and surveying for the dock were initiated but the initial tenders were considered too expensive, and the plans were put on hold until the final design by Auckland Harbour Board

engineer William Errington was approved in 1876. Constructed in 1878-1879, the final design for the Auckland Graving dock measured 300ft in length and 12ft deep and included two centrifugal pumps with high pressure steam engines, one auxiliary centrifugal drain pump and two large boilers. The engine house and boiler house were built under the same roof and would measure 20ft square and 30ft by 20ft respectively. The chimney shaft was 50ft high and 7ft square.

Land reclamations

Reclamation (7) of the 1878 shoreline along with an associated sea wall was undertaken specifically for the construction of the Auckland Graving Dock in 1878-79 and comprised of 0.40ha of landfill. Historic photographs (late 1870s) illustrate the recently completed reclamation and seawall for the Auckland Graving Dock which is under construction. Reclamation (22) of approximately the same size was undertaken in 1915 after the closure of the Auckland Graving Dock.

The Gunson Building

The Gunson Building was a four story, triangular, brick building located on the corner of Sturdee Street and Customs Street West. It was built between 1906 and 1912 (prior to the demolition of the graving dock) and was demolished prior to 1972 (Figures 3). The Gunson Building is partially located within the current application area at the southeastern corner (Attachment 6).

This building has yet to be recorded in the Auckland Council Tūtangi Ora heritage database.

The proposed works will impact on the locations of both the 19th (1879) and early 20th century (1915) reclamations and associated seawalls, the Auckland Graving Dock (R11/3458/ CHI 483) and the Gunson Building (1912). It is noted that the graving dock was demolished in 1915 and at least some of the structural remains were removed for reuse; however, the extent of what was removed and what was left in place cannot be determined without excavation of the site.

The archaeological assessment has identified that the main impact from previous construction works in the project area are the construction of the WWII warehouses dating to the 1940s and the existing Downtown Carpark (1972) (Attachment 6). Based on plans from the construction of the car park, the piles extend from the reclaimed ground surface into the underlying rock. There was also a split-level basement beneath the northern half of the building footprint (although the depth of the basement is not noted). These works would have damaged and likely destroyed archaeological remains, but the southern part of the application area may have a lower degree of modification and a higher probability that archaeological remains have survived.

The project archaeologist summarises the archaeological potential as follows:

“The Project Area contains the recorded archaeological site R11/3458 and is also located in an area reclaimed during the late 19th and early 20th centuries which is likely to contain additional 19th and early 20th century remains, such as seawalls, building foundations, historic artefacts, drainage pipes and other features”.

“Based on the overall depth of the reclamation fill, the additional depth of the 1879 graving dock, and archaeological remains identified in nearby areas that had also been affected by development in the 1960s/70s, it is considered very likely that some archaeological evidence has survived”.

The proposed works will include extensive excavation through the reclamation fill down to and into the base rock layer to a depth of c.16m below the existing ground surface. This will require the removal of all fill and marine sediments. Consequently, any surviving remains of the Auckland Graving Dock (R11/3458/CHI 483), and associated reclamation features will be destroyed by the proposed works.

Clough and Associates conclude that as the proposed activity will affect the recorded archaeological site R11/3458, an Archaeological Authority must be obtained prior to works being undertaken. The

effects on archaeological and historic heritage values should be mitigated through archaeological investigation of site R11/3458 and the recovery of information relating to the history of reclamation in the CBD and activities associated with the Auckland waterfront.

I agree with and support the Clough and Associates assessment of the risk to previously recorded and potential unidentified archaeological/historic heritage features within the project area. I also agree with the proposed mitigation.

6.0 Section 67 Information Gap

I have identified that there are no section 67 information gaps.

7.0 Recommendation

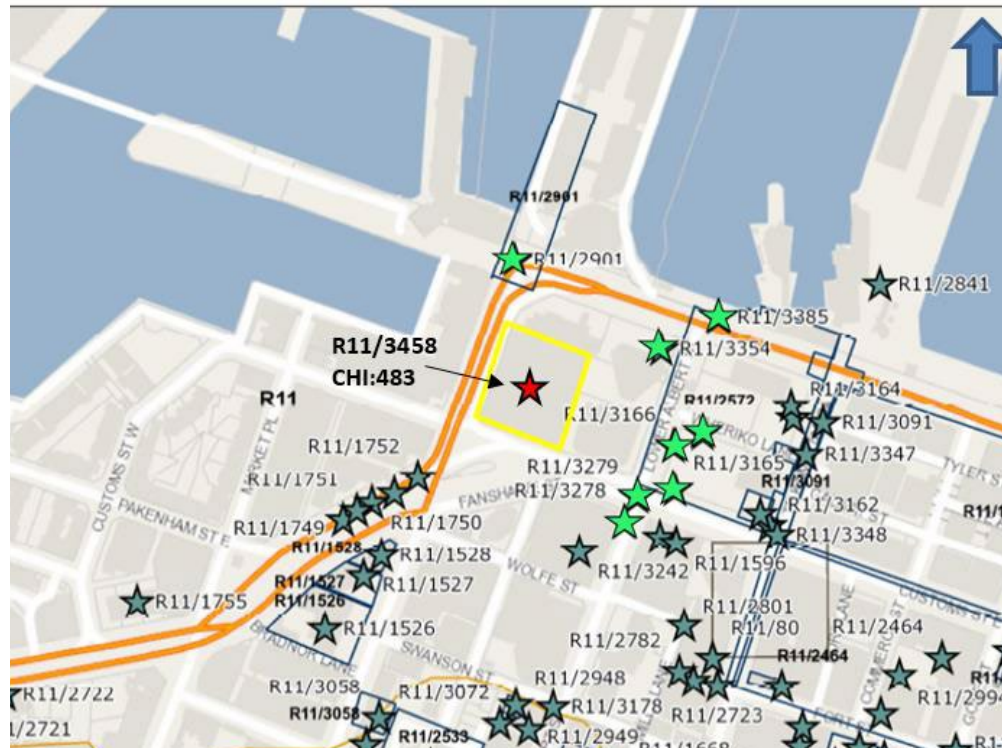
I have assessed the effects of the proposed Downtown Carpark Development application on historic heritage resource, the magnitude of these effects, and whether adverse effects are avoided, minimised or mitigated.

There is no National Policy Statement on Historic Heritage to assess this application against. In reviewing the application documentation, the proposed condition 45 (Prior to Commencement Conditions-Preconstruction meeting) and condition 54 (During Works Conditions-Archaeological recording) nominated by the applicant are sufficient to mitigate the potential risk of archaeological/historic heritage discovery and give effect to s6 (f) of the RMA.

8.0 Proposed Conditions

No amendments or additions to the proposed conditions are necessary.

9.0 Supporting Documents



Attachment 1. Map showing the recorded archaeological sites in proximity to the application area (outlined in yellow) The Auckland Graving Dock, NZAA R11/3458/ CHI 483 is represented by red star (source: Clough and Associates 2024).



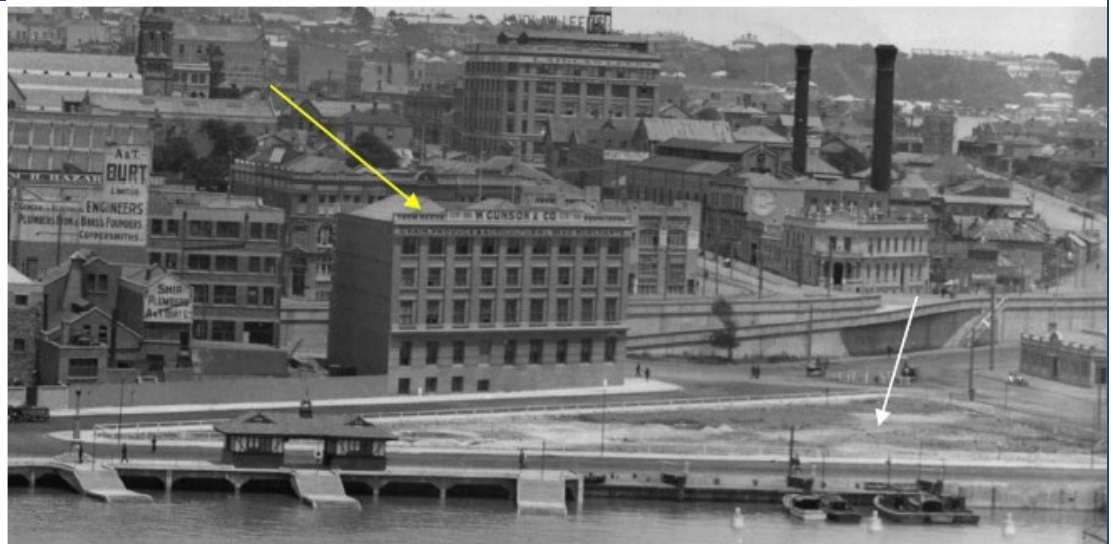
Attachment 2. Historic photograph dating to the late 1870s, showing the recently reclaimed land (reclamation 7) with the Auckland Graving Dock under construction (the graving dock engine, boiler house and chimney at right). Source Clough and Associates 2024.



Attachment 3. Photograph of the Auckland Graving Dock and engine and boiler house and chimney dating to the 1880s (source: Clough and Associates 2024).



Attachment 4. Historic photograph dated 1912, showing the Auckland Graving Dock with boats in for repairs and location of the Gunson Building (white arrow). Source Clough and Associates 2024.



Attachment 5. Historic photograph dated 1917, showing the newly reclaimed site of the Auckland Graving Dock (white arrow) and associated seawall; the recently completed Sturdee Street and the 1912 Gunson Building (yellow arrow). Source Clough and Associates 2024.



Attachment 6. Aerial photograph dated 1959, with the application area outlined in yellow (left), showing the World War II concrete warehouses/supply stores for U.S. forces. Note the 1912 Gunson Building bottom left corner of the project area. Source Clough and Associates 2024.