

Milldale Fast-Track

29/07/2025 – Auckland Council Response

Annexure 23:

Heritage & Archaeology

Technical Memorandum

FTAA-2503-1038: Milldale Development Stages 4C, Stages 10-13 and the associated supporting temporary Waste Water Treatment Plant; historic heritage, archaeology.

Resource Consents; BUN60446761

Date: 3/06/2025

1. Introduction

- 1.1 My name is Mica Plowman, and I am a Principal Heritage Advisor at Auckland Council (the Council). I have a Bachelor of Arts (BA) and Master of Arts (MA) (1st Class Hons) from Auckland University in Anthropology and Māori Studies.
- 1.2 The focus of my current role, which I have held for twelve years, is to provide specialist expertise and leadership in the development and implementation of plans, programmes and operational strategies to identify, conserve and enhance historic heritage features and landscapes within the Auckland region. I support council departments in meeting their requirements of the RMA (Part 2, Section 6 e and f matters) and the HNZPT Act (2014). I routinely provide statutory and non-statutory heritage advice and reporting outputs into the regulatory process and work programmes across the council.
- 1.1 I have undertaken a review of the Milldale development Stage 4C, Stages 10-13 and the associated waste water treatment plant (WWTP) application under the Fast Track Approvals Act 2024 (FTAA) on behalf of Auckland Council in relation to historic heritage and archaeological effects.

2. Documents reviewed:

Volume 2: Milldale Stages 10 – 13 Milldale, Wainui. Fast-track Approvals Act 2024 Substantive Application (AEE). Prepared for Fulton Hogan Land Development by B & A Urban and Environmental Limited and Wood & Partners Associates Limited, 28 March 2025.

Volume 3: Milldale Stage 4C 21 Karapapa Road, Milldale, Wainui Fast-track Approvals Act 2024 Substantive Application (AEE). Prepared for Fulton Hogan Land Development by Wood & Partners Consultants Limited, 28 March 2025.

Volume 4: Milldale Wastewater Treatment Plant Milldale, Wainui Fast Track Approvals Act 2024 Substantive Application (AEE). Prepared for Fulton Hogan Land Development by Wood & Partners Consultants Limited, 28 March 2025.

Volume 5:- Archaeological Authority

Volume 5: Archaeological Authority Milldale, Wainui Fast-track Approvals Act 2024 Substantive Application. Prepared for Fulton Hogan Land Development by B & A Urban and Environmental Limited and Wood & Partners Associates Limited 28th February 2025.

Appendix 5B (Part 1) Archaeological Assessment: Wainui, Auckland, Proposed Milldale Residential Development, Stages 4C and 10-13: Fast Track Archaeological Assessment. Prepared for Fulton Hogan Land Development by Clough and Associates Limited (Ellen Cameron) February 2025.

Appendix 5B (Part 2) *Archaeological Assessment: Wainui, Auckland, Milldale Development, Auckland – Wastewater Treatment Plant: Fast Track Archaeological Assessment Prepared for Fulton Hogan Land Development Ltd* by Clough and Associates Limited (Ellen Cameron) February 2025.

Appendix 5C- *Archaeological Management Plan: Wainui, Auckland, Proposed Milldale Fast track Residential development*. Prepared for Fulton Hogan land Development Limited by Clough and Associates Limited (Ellen Cameron) February 2025.

Volume 6: *Milldale Stages 10 – 13, 4C and WWTP. Proposed Conditions of Consent. Milldale, Wainui. Fast-track Approvals Act 2024 Substantive Application*. Prepared for Fulton Hogan Land Development by Wood & Partners Consultants Limited, 28 March 2025.

3. Reasons for Consent

- 3.1 The proposed works, as described in the FTAA application and supporting document, do not affect any scheduled historic heritage places identified in Schedule 14.1 (Schedule of Historic Heritage) in the Auckland Unitary Plan operative in part (April 2025) [AUP OIP]. No consents are required under Chapter D.17 Historic Heritage [AUP OIP].

4. Subject and scope

- 4.1 The Fulton Hogan Land Development (FHLD) Milldale application is a proposed residential development at Wainui in North Auckland. The application, for Milldale Stages 4C, 10-13 and the associated Waste Water Treatment Plant (WWTP) is for the final stages of the development which will enable an additional 1,155 dwellings and supporting commercial services to be constructed. The WWTP has been included in the application in the event that there are short term capacity constraints at the Army Bay wastewater treatment plant.¹
- 4.2 In accordance with clause 2(1)(h)-(i) of Schedule 8 of the FTA Act, the applicant has provided two archaeological assessments by a Subject Matter Expert (SME) as Volume 5 (Appendix 5B Part 1-2) in the application documents.² The assessment provided as Volume 5 Appendix 5B Part 1 relates to Milldale Stages 4C and 10-13 and the

¹ Volume 2: *Milldale Stages 10 – 13 Milldale, Wainui. Fast-track Approvals Act 2024 Substantive Application (AEE)*. Prepared for Fulton Hogan Land Development by B & A Urban and Environmental Limited and Wood & Partners Associates Limited, 28 March 2025.

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Volume 4: *Milldale Wastewater Treatment Plant Milldale, Wainui Fast Track Approvals Act 2024 Substantive Application (AEE)*. Prepared for Fulton Hogan Land Development by Wood & Partners Consultants Limited, 28 March 2025.

² Appendix 5B (Part 1) *Archaeological Assessment: Wainui, Auckland, Proposed Milldale Residential Development, Stages 4C and 10-13: Fast Track Archaeological Assessment*. Prepared for Fulton Hogan Land Development by Clough and Associates Limited (Ellen Cameron) February 2025:

Appendix 5B (Part 2) *Archaeological Assessment: Wainui, Auckland, Milldale Development, Auckland – Wastewater Treatment Plant: Fast Track Archaeological Assessment Prepared for Fulton Hogan Land Development Ltd* by Clough and Associates Limited (Ellen Cameron) February 2025.

assessment provided as Volume 5 Appendix 5B Part 2 relates to the WWTP.

- 4.3 The methodology used for these SME assessment reports (ibid) follows normal professional practice, that is, data collection and analysis from acknowledged professional sources (e.g. relevant reports, archives) as well as the New Zealand Archaeological Association site record files (ArchSite) and Auckland Council public data sets (GeoMaps and Cultural Heritage Inventory/Tūtangi Ora). Field survey of the application areas was undertaken, to test and verify the data through visual survey with limited subsurface testing.³ This is standard professional practice to ascertain if an area, place, building or archaeological site might be affected in any way by any part of the proposal.
- 4.4 This memo provides an analysis of risk to the potential archaeological and historic heritage sites for both the Milldale Stage 4C, and Stage 10-13 development areas and the WWTP.
- 4.5 The location and components of the application are illustrated in Figure 1.

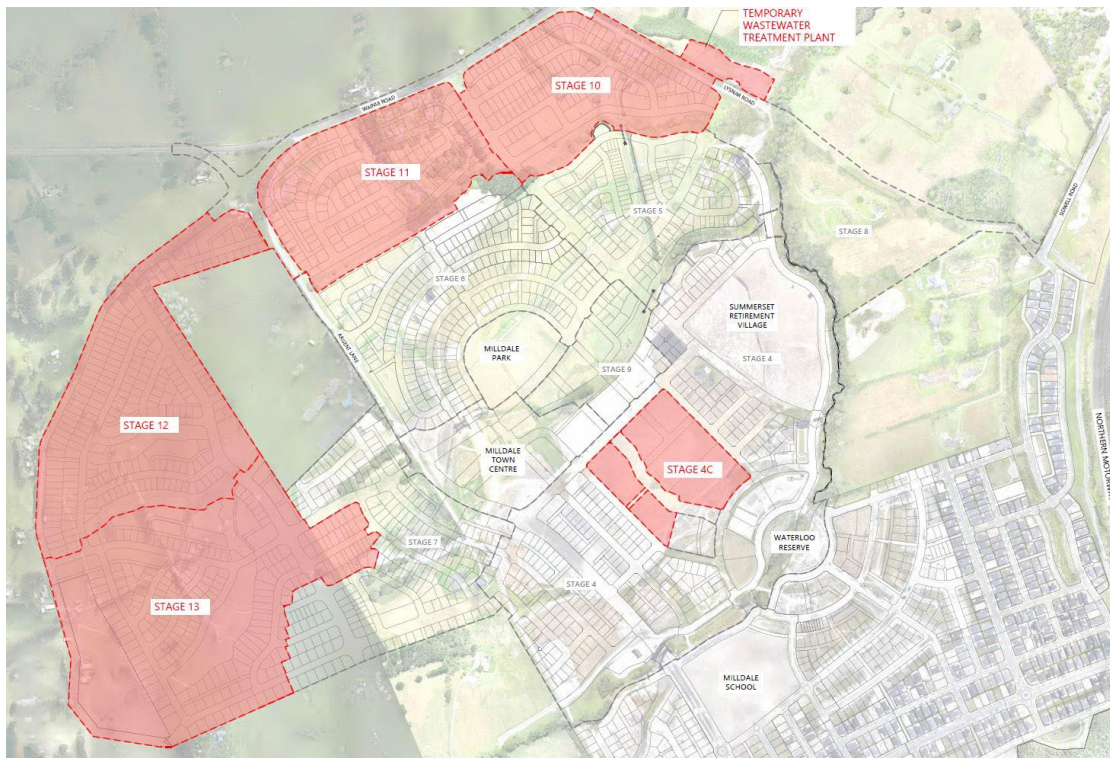


Figure 1. Plan showing Milldale Stages 4C, 10-13 and the location of the WWTP (shown in red) (Source Clough Appendix 5B (Part 1) February 2025).

³. Appendix 5B (Part 1) *Archaeological Assessment: Wainui, Auckland, Proposed Milldale Residential Development, Stages 4C and 10-13: Fast Track Archaeological Assessment*. Prepared for Fulton Hogan Land Development by Clough and Associates Limited (Ellen Cameron) February 2025:

Appendix 5B (Part 2) *Archaeological Assessment: Wainui, Auckland, Milldale Development, Auckland – Wastewater Treatment Plant: Fast Track Archaeological Assessment* Prepared for Fulton Hogan Land Development Ltd by Clough and Associates Limited (Ellen Cameron) February 2025.

5. Summary of key issues

Waste Water Treatment Plant (WWTP)

- 5.1 The archaeological assessment and field survey prepared by Clough and Associates⁴ confirms that there are no recorded historic heritage or archaeological sites within the proposed wastewater treatment plant development area and no previously unidentified sites were encountered during the field survey of the area.
- 5.2 Clough and Associates state that the proposed WWTP development will have no effects on known archaeological or other historic heritage values. They conclude that it is appropriate for the WWTP earthworks to proceed under the AUP OIP Accidental Discovery Rule E12.6.1 to mitigate the risk of encountering any undetected archaeological remains during earthworks.

Milldale Stages 4C and Stages 10-13

- 5.3 The archaeological assessment prepared by Clough and Associates⁵ identifies one recorded archaeological site; a historic European dry stone wall (R10/1452) and an area of archaeological potential within the Milldale Stage 11 development area.

European drystone wall (R10/1452)

- 5.4 The recorded European drystone wall (R10/1452) is 20.5m in length and approximately 1m in height, constructed of irregularly shaped field stones of varying sizes. The date for the construction of the wall has not been determined, although historical research and its siting along the boundary of 19th century allotments suggests a pre-1900 construction date.
- 5.5 The recorded European drystone wall (R10/1452 drystone wall) cannot be avoided by the Milldale development. Therefore, an archaeological authority will need to be sought and obtained from Heritage New Zealand Pouhere Taonga (HNZPT) or under section 42(3)(i) of the FTAA prior to earthworks. This is a legal requirement.

Archaeological Potential

- 5.6 Historical research undertaken by Clough and Associates has indicated that the Stage 4C, Stage 10-13 and the WWTP properties are situated in allotments that were granted to early European settlers in the mid-19th century and have been in used historically primarily for general agricultural purposes. The potential for archaeological sites associated with Māori occupation and settlement is considered to be low as the development properties are located inland and away from navigable waterways.⁶

⁴ Appendix 5B (Part 2) *Archaeological Assessment: Wainui, Auckland, Milldale Development, Auckland – Wastewater Treatment Plant: Fast Track Archaeological Assessment Prepared for .Fulton Hogan Land Development Ltd* by Clough and Associates Limited (Ellen Cameron) February 2025.

⁵ Appendix 5B (Part 1) *Archaeological Assessment: Wainui, Auckland, Proposed Milldale Residential Development, Stages 4C and 10-13: Fast Track Archaeological Assessment*. Prepared for Fulton Hogan Land Development by Clough and Associates Limited (Ellen Cameron) February 2025.

⁶ Appendix 5B (Part 1) *Archaeological Assessment: Wainui, Auckland, Proposed Milldale Residential Development, Stages 4C and 10-13: Fast Track Archaeological Assessment*. Prepared for Fulton Hogan Land Development by Clough and Associates Limited (Ellen Cameron) February 2025.

5.7 An area of archaeological potential has been identified through historic research along the ridgetop in Lot 3 DP 151229,⁷ (Stage 11), consisting of a flattened area that could relate to a former historic structure. No archaeological evidence was identified at the location.

5.8 It was recommended by Clough and Associates that preliminary earthworks in this area should be carried out under archaeological supervision.

Applicants proposed mitigation

5.9 Clough and Associates state that apart from site R10/1452 (Stage 11) and area of archaeological potential at Lot 3 DP 151229, the remainder of the Milldale development areas have no known archaeological values.

5.10 Nonetheless, to mitigate the risk of discovery of unrecorded subsurface archaeological within the project area, Clough and Associates⁸ advise that a general precautionary Archaeological Authority from Heritage New Zealand Pouhere Taonga (2014) be obtained prior to the onset of earthworks for Stages 4C and 10-13.

5.11 The application also provides an Archaeological Management Plan (AMP)⁹ that includes a recording strategy for the R10/1452 – Drystone wall, along with specific operational procedures and requirements to manage effects on unrecorded archaeological sites, including koiwi tangata (human remains) or taonga (Māori artefacts).

5.12 As a listed project in Schedule 2 and in accordance with s42 of the FTAA, the applicant is seeking approval for an archaeological authority¹⁰ under section 42(3)(i) of the FTAA that would otherwise be applied for under the Heritage New Zealand Pouhere Taonga Act (HNZPTA) 2014.

5.13 The archaeological authority under section 42(3)(i) of the FTAA is sought to remove (destroy) site R10/1452 and as a precautionary matter for any accidental discovery within the site extent covering Stages 10 – 13 and the WWTP site.¹¹

5.14 The application also seeks the approval of a person nominated to undertake the activity under the Archaeological Authority. In this case, Ellen Cameron of Clough and Associates

⁷ Updated legal description: LOT 9006 DP 609046.

⁸ Appendix 5B (Part 1) *Archaeological Assessment: Wainui, Auckland, Proposed Milldale Residential Development, Stages 4C and 10-13: Fast Track Archaeological Assessment*. Prepared for Fulton Hogan Land Development by Clough and Associates Limited (Ellen Cameron) February 2025.

⁹Appendix 5B (Part 2) *Archaeological Assessment: Wainui, Auckland, Milldale Development, Auckland – Wastewater Treatment Plant: Fast Track Archaeological Assessment Prepared for Fulton Hogan Land Development Ltd* by Clough and Associates Limited (Ellen Cameron) February 2025.

¹⁰ *Volume 5: Archaeological Authority Milldale, Wainui Fast-track Approvals Act 2024 Substantive Application*. Prepared for Fulton Hogan Land Development by B & A Urban and Environmental Limited and Wood & Partners Associates Limited 28th February 2025.

¹¹ *Volume 6: Milldale Stages 10 – 13, 4C and WWTP. Proposed Conditions of Consent. Milldale, Wainui. Fast-track Approvals Act 2024 Substantive Application*. Prepared for Fulton Hogan Land Development by Wood & Partners Consultants Limited, 28 March 2025.

is the proposed Project Archaeologist.¹²

- 5.15 Overall, the applicant considers that any adverse effects on archaeological values resulting from the proposed development are likely to be minor subject to the implementation of the recommendations set out in the authority application (AEE Volume 5), the AMP and the nominated conditions provided in Volume 5 and Volume 6 of the application.

6. Overall comment

- 6.1 I agree with and support the Clough and Associates assessment of effects on recorded a recorded archaeological site (R10/1452) and the potential risk to previously unidentified archaeological/historic heritage features within the project area. I also agree that it is appropriate to secure either an HNZPTA 2014 authority or an authority under section 42(3)(i) of the FTAA prior to earthworks commencing.
- 6.2 I agree that the information provided in the application meets the detailed information and assessment requirements of clause 2 and clause 7 of Schedule 8 of the FTAA.
- 6.3 An archaeological Authority granted under the FTAA has the same force and effect as an Authority granted under the HNZPTA 2014 and for purposes of the HNZPTA 2014, must be treated as if it were an authority under that Act (Schedule 7 Section 12A (a) and (b)).¹³

7. Comment on proposed conditions

- 7.1 The detailed Archaeological Authority application, supporting documents and nominated conditions, if imposed, will ensure that all works are carried out in accordance with accepted archaeological practices.
- 7.2 The application nominates eight archaeological conditions in the Authority Application (Volume 5 section 3.3)¹⁴ and the proposed conditions (Volume 6 section 5.3)¹⁵, including conditions relating to;
1. Site briefing
 2. Start work notification
 3. Archaeological management plan
 4. Additional archaeological sites
 5. Archaeological finds

¹² Volume 5: Archaeological Authority Milldale, Wainui Fast-track Approvals Act 2024 Substantive Application. Prepared for Fulton Hogan Land Development by B & A Urban and Environmental Limited and Wood & Partners Associates Limited 28th February 2025.

¹³ Volume 5: Archaeological Authority Milldale, Wainui Fast-track Approvals Act 2024 Substantive Application. Prepared for Fulton Hogan Land Development by B & A Urban and Environmental Limited and Wood & Partners Associates Limited 28th February 2025.

¹⁴ Volume 5: Archaeological Authority Milldale, Wainui Fast-track Approvals Act 2024 Substantive Application. Prepared for Fulton Hogan Land Development by B & A Urban and Environmental Limited and Wood & Partners Associates Limited 28th February 2025

¹⁵ Volume 6: Milldale Stages 10 – 13, 4C and WWTP. Proposed Conditions of Consent. Milldale, Wainui. Fast-track Approvals Act 2024 Substantive Application. Prepared for Fulton Hogan Land Development by Wood & Partners Consultants Limited, 28 March 2025.

6. Mana Whenua engagement (specifically with Ngāti Manuhiri and Te Kawerau ā Maki)
 7. Completion of archaeological siteworks
 8. Archaeological records (reporting)
- 7.3 I agree that the nominated conditions have been set out to reflect what would otherwise be imposed by Heritage New Zealand Pouhere Taonga if the project was approved under the Heritage New Zealand Pouhere Taonga Act 2014.

8. Recommendations

- 8.1 I have assessed the effects of the proposed Fulton Hogan Milldale Stage 4C, 10-13 development and the associated waste water treatment plant on historic heritage sites and values, the magnitude of these effects, and whether adverse effects are avoided, minimised or mitigated.
- 8.2 There is no National Policy Statement on Historic Heritage to assess this application against.
- 8.3 In reviewing the application documentation, the conditions nominated by the application and the attendant Archaeological Management Plan are sufficient to mitigate the potential risk of archaeological/historic heritage discovery and give effect to s6 (f) of the RMA.

Signed:

Mica Plowman

3rd June 2025