



To: Expert Panel

From: Fast-track Team, Heritage New Zealand Pouhere Taonga

Date: 4 September 2026

Subject: **FTAA-2603-1181: Response to Minute 16**

1. On 7 August 2026 the Applicant filed additional documents in response to section 53 comments and matters raised in Minute 7 relating to the Panel's review of conditions. This document bundle included:
 - Appendix K – Heritage & Archaeology Services Ltd- Updated archaeological management plan; and
 - Appendix 8 – Commentary on panel's review of Archaeological Authority conditions.
2. Minutes 15 and 16 of the Panel requested comment from Heritage New Zealand Pouhere Taonga (Heritage New Zealand) in relation to the archaeological authority conditions. Heritage New Zealand has reviewed the documents in [1] and offers the following comments to assist the Panel.

Archaeological Management Plan (AMP)

3. In its section 51 Report, Heritage New Zealand pointed out three key elements that were missing from the AMP, specifically:
 - procedures for any archaeological investigation or recording of archaeological information;
 - building recording level and process for R26/885;
 - research investigation strategy in relation to R26/886 Depression sites 3, 6a and 6b.
4. The updated AMP, dated July 2026, has addressed these matters and Heritage New Zealand considers that the updated AMP will ensure that the modification or destruction of any archaeological sites pursuant to this authority will be carried out in a way that is respectful to those sites and that the information that they contain is recorded in an appropriate manner.
5. As such, Heritage New Zealand certifies that Patrick Harsveldt's "*Mt Welcome Station Subdivision Development: Archaeological Management Plan*, prepared for Pukerua Property Group LP dated July 2026" achieves those objectives and this can be reflected in condition 2 of the authority, if granted. The re-certification requirement remains if any amendments are made to this (now) certified AMP.

Conditions

6. The following table sets out Heritage New Zealand's response to Panel comments, Applicant comments, and includes recommended wording taking into account all comments and the SMART principles.

	Condition	Response to comment	Recommended wording
1	Start Works	No comments to respond to. Note, the key reason for this condition is to ensure that Heritage New Zealand can initiate its monitoring and compliance for this authority.	The Authority Holder must advise Heritage New Zealand Pouhere Taonga (HNZPT) and Ngāti Toa Rangatira of the date when archaeological works will begin at least two working days before archaeological works start.
2	Archaeological Management Plan	Comments here are mostly redundant as with the recent amendments the AMP has been certified by Heritage New Zealand. Agree with Patrick Harsveldt (PH) comments recertification/approval is a relatively straightforward process and usually involves updating details, rather than the structure and substance of the AMP itself.	All works must be undertaken in accordance with the Archaeological Management Plan prepared by Patrick Harsveldt <i>“Mt Welcome Station Subdivision Development: Archaeological Management Plan</i>, prepared for Pukerua Property Group LP” dated July 2026 (AMP). The Authority Holder may update the AMP by submitting the amended AMP in writing to HNZPT for its written certification.
3	Landowner Consent	There is a list of legal descriptions of the land parcel at the start of the Authority; this will be entered into the Heritage New Zealand Authority Portal if granted. There is no need for a timeframe, as the works cannot begin until all landowner consent is obtained and provided – the important element is that consent is obtained – rather than the timing of that consent.	The Authority Holder must provide HNZPT with the written consent of all landowners of the land subject to this Authority prior to any archaeological works commencing.
4	Site Briefing	This is the standard wording used in all briefing conditions. Whilst we do not consider an advice note is necessary for “who may appoint a person to carry out the briefing on their behalf”, Heritage New Zealand considers as long as this intent is retained then we accept the condition.	The Authority Holder must ensure that all contractors working on the project are briefed on site by the section 45 approved person (who may appoint a person to carry out the briefing on their behalf) prior to any archaeological works commencing. The briefing must include the possibility of encountering archaeological evidence, how to identify possible archaeological sites, the archaeological work

			required by the conditions of this authority, and contractors' responsibilities with regard to discovering archaeological evidence.
5	Tikanga	Agree that usually this condition does include specific protocols in relation to access, taonga finds, and discussion regarding final report. This condition should be discussed with Ngāti Toa Rangatira prior to finalising.	Archaeological work must be undertaken in compliance with any tikanga Māori protocols agreed between the Authority Holder and Ngāti Toa Rangatira, including: • The Authority Holder shall enable access for Ngāti Toa Rangatira to any archaeological site encountered in order to undertake tikanga subject to any health and safety requirements. • If any possible taonga or Māori artefacts are encountered, Ngāti Toa Rangatira shall be informed to enable appropriate tikanga to be undertaken, provided all statutory requirements under the Heritage New Zealand Pouhere Taonga Act 2014 and the Protected Objects Act 1975 are met. • If any archaeological site is encountered and works modifying or destroying the archaeological site are undertaken, Ngāti Toa Rangatira shall be provided with a copy of any reports completed under Condition 12 and be given an opportunity to discuss it with the section 45 Approved Person if required.
6	Kōiwi Discovery	No comment received	If any kōiwi (human remains) are encountered, all works must cease within 20 metres of the discovery. HNZPT, New Zealand Police and Ngāti Toa Rangatira must be advised immediately. Any steps following must be undertaken in accordance with Guidelines for Kōiwi Tangata/Human Remains (AGS8 2014) and no further work in

			the area may take place until future actions have been agreed by all parties.
7	Monitoring	As above for condition 4	Any earthworks that may affect an archaeological site must be monitored by the section 45 approved person, (who may appoint a person to carry out the monitoring on their behalf), in accordance with accepted archaeological practice and the AMP.
8	Investigation	Agree with PH comment. This condition should refer to any investigation being undertaken in accordance with accepted archaeological practice. The AMP alone does not require the appropriate level of detail for investigation, recording, and/or analysis – but accepted archaeological practice principles will guide and govern what may be required in the event archaeological evidence is encountered.	Any archaeological evidence encountered during the exercise of this Authority must be investigated, recorded and analysed in accordance with accepted archaeological practice. R26/885 must be investigated, recorded and analysed prior to demolition to document and recover information about construction, alteration and use through time. This is to be undertaken to a minimum standard of Level III recording as defined in Guidelines for the Investigation and Recording of Buildings and Standing Structures (AGS1 2018).
9	Annual Reporting	HNZPT agrees this condition should have a timeframe attached, and considers that “within 20 working days” still provides flexibility that the report can be submitted prior to the anniversary (as noted in PH’s comment).	Within 20 working days following each anniversary of the date of construction commencing on land subject to this Authority until the report required under Condition 12 is submitted to HNZPT, the Authority Holder must submit to HNZPT a written report containing a summary of the progress of any archaeological works and any archaeological findings.
10	Work Completion Notification	It is not clear why this condition requires written notification to parties and condition 1 requires parties to be advised. Once the Authority is entered into the Heritage New Zealand Authority Portal this notification is entered directly into the Portal – therefore no need for addition of “written”.	The Authority Holder must advise HNZPT and Ngāti Toa Rangatira of the completion of archaeological works within five working days of completion.

		Accept “must” rather than “shall”.	
11	Completion of Archaeological Siteworks	Disagree with the removal of “updated”. Confirm the reasoning set out by PH - there are two site record forms that will require updating, in addition to any new sites encountered which would require submission of new site record forms – therefore “updated” is required.	Within 20 working days of the completion of on-site archaeological work associated with this authority, the Authority Holder must ensure that: (a) An interim report, following the Archaeological Report Guideline (AGS12 2023) is submitted to HNZPT for inclusion in the HNZPT Archaeological Reports Digital Library. (b) Site Record Forms are updated or submitted to the NZAA Site Recording Scheme.
12	Archaeological Records	Accept “must” and “provided”, however there is no need for “written report” as the requirement is to prepare the reports in accordance with the Archaeological Report Guideline (AGS12 2023), which refers to the report as “final report” and it is required to be in writing (same as the “interim report” described in condition 11 above)	Within 12 months of the completion of the on-site archaeological work, the Authority Holder must ensure that a final report, completed following the Archaeological Report Guideline (AGS12 2023), is provided to HNZPT for inclusion in HNZPT’s Archaeological Reports Digital Library and Ngāti Toa Rangatira. A copy must also be provided to the NZAA Central Filekeeper.