Beachlands South Fast-track

Auckland Council Specialist Memo

Annexure X:

Archaeology / Historic Heritage

Mica Plowman

14 August 2026

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name:	Beachlands South
Fast-Track application number:	EPA reference: FTAA-2606-1256 Council reference: BUN60467962

2.0 Technical Specialist Memo - Archaeology/Historic Heritage

To:	Brooke Dales – Lead Planner Adonica Giborees – Principal Project Lead
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 (Code) 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 conferencing, 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:	14/8/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

Beachlands South. Fast-track Approval Substantive Application. Assessment of Environmental Effects and Statutory Analysis. Prepared for Beachlands South Limited Partnership by UNIO Environmental, 26 June 2026.

Appendices and Attachments

- Attachment B Planning Assessment
- Attachment C Proposed Draft Consent Conditions

Archaeological Assessment

- Attachment 17 Archaeological Assessment
- Attachment 17A Archaeological Vegetation Management Plan and Planting Plan
- Attachment 17B Archaeological Bundle – including Archaeological Management Plan

- Attachment 20 Cultural Values Assessment

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 (June 2026) [AUP OIP]. No consents are required under Chapter D17 Historic Heritage [AUP OIP]. There are no additional reasons for consent.

5.0 Specialist Assessment

There are twenty-eight archaeological sites located within 250m of the development project area relating to prehistoric Māori settlement. These sites are comprised primarily of typical undefended habitation features including storage pits/ terraces and midden deposits but include one defended pa site. These sites are described in detail in the applicant's archaeological assessment. Only the recorded archaeological sites identified as being located within the application area are discussed in this memo.

There are eleven recorded sites (R11/343, R11/344, R11/345, R11/1438, R11/1439, R11/1440, R11/1617, R11/1618, R11/1621, R11/1622, and R11/1623) that are either located within, or extend into, areas of proposed ground disturbance associated with bulk earthworks or the Ecological Protection Area Network (EPAN) works.

One additional recorded site, R11/1445, lies within an area subject to an earthworks consent covering part of the Development Site and is covered by HNZPT Archaeological Authority 2026/140. The authority was obtained under section 44(a) of the HNZPTA for an activity that may modify or destroy one or more archaeological sites within the land identified in the application as Stage 1.

Of the eleven recorded sites within the Beachlands South development footprint, the extent of earthworks intersects the previously recorded extents of seven archaeological sites (R11/343, R11/1439, R11/1617, R11/1618, R11/1621, R11/1623 and R11/1440). The recorded site extents are based on previous investigations and/or recorded locations and do not necessarily represent the full extent of archaeological deposits.

The location and archaeological extent of these recorded sites in relation to the development area is provided in attachment 1.

Importantly, no intact archaeological deposits were identified within the proposed earthworks footprint for these sites during the field survey undertaken for this application. Consequently, although the proposed works overlap recorded site extents, there is currently no evidence that intact archaeological deposits will be affected within the earthworks footprint. However, the potential exists that archaeological deposits or features survive within these areas and could be modified or removed during earthworks.

There also remains the potential for previously unrecorded archaeological material to be encountered during earthworks in areas that have not been subject to detailed archaeological investigation. Such material is most likely to include midden, oven stones, and associated occupation debris.

Clough and Associates summarise the archaeological value of the recorded sites within the project area and the wider area as follows:

"Overall, the sites are assessed as having limited to moderate archaeological value at a site-specific level, with variation across the group. While a number of sites have been modified or not reidentified, others retain intact subsurface deposits with moderate information potential. When considered collectively as a landscape, the archaeological values are assessed as moderate to high, reflecting both the presence of surviving deposits and the degree of historic modification across the broader area."

Clough and Associates conclude that the potential effect on recorded archaeological sites is limited in the absence of confirmed archaeological deposits within the earthworks footprint and the localised areas where potential effects might occur. They also comment that while the recorded sites are evidence of Māori settlement activity within the wider Beachlands area, the proposed works are not expected to result in a substantial loss of archaeological information.

To mitigate the risk of discovery of unrecorded subsurface archaeological sites within the project area, any archaeological features encountered will be managed in accordance with the requirements of the archaeological authority sought under section 44(a) (i) of the FTAA.

The applicant concludes that the potential adverse effects on archaeological values are avoided as far as practicable and will be minimised through the implementation of the Archaeological Management Plan, the Archaeological Vegetation Management Plan and the archaeological monitoring and recording proposed as conditions of the authority sought.

I agree with and support the Clough and Associates assessment of the potential risk to previously unidentified archaeological/historic heritage features within the project area. I also agree that it is appropriate to secure an Authority under section 43 of the FTAA.

6.0 Section 67 Information Gap

I have identified that there are no outstanding issues or information gaps.

7.0 Recommendation

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

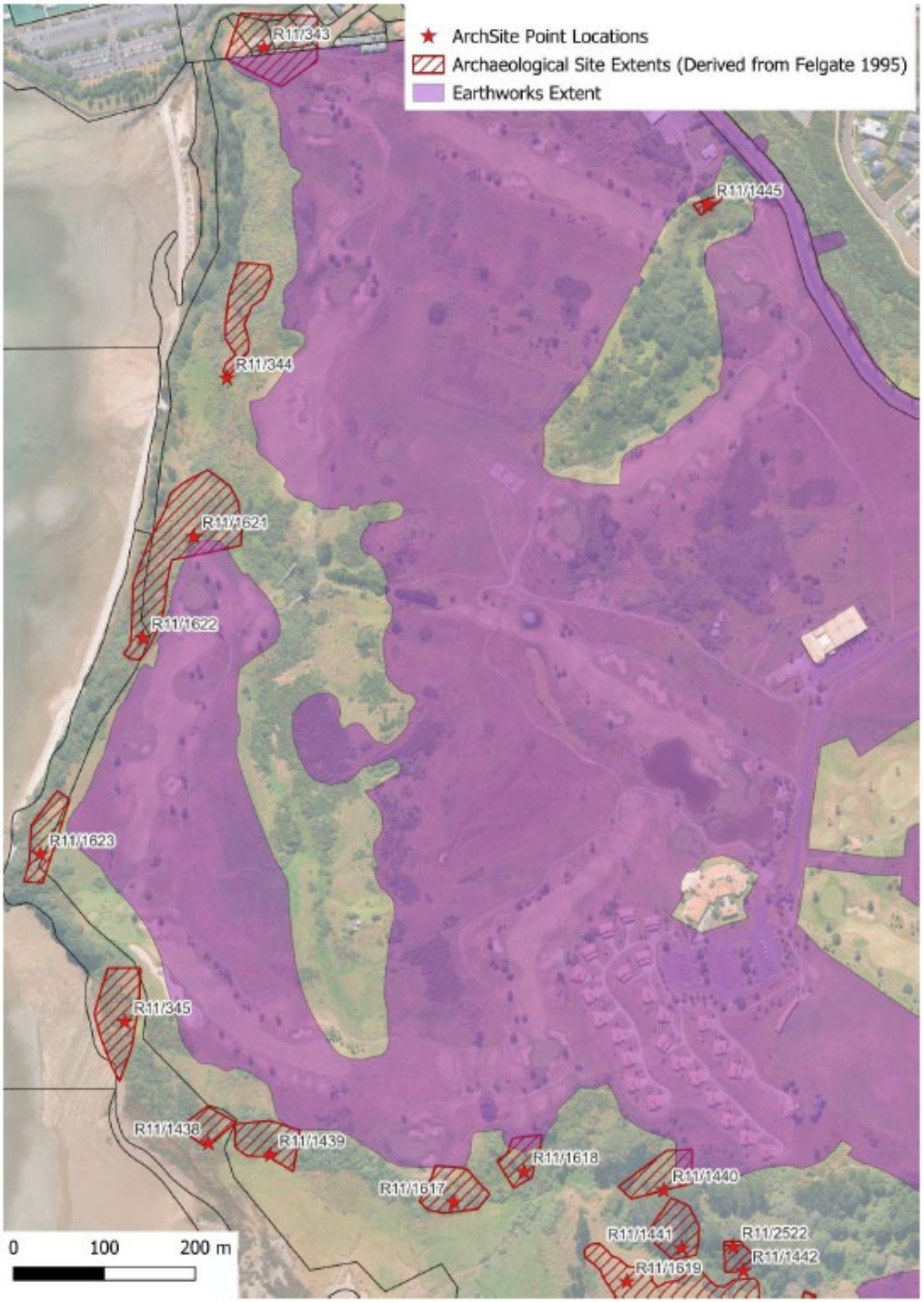
There is no National Policy Statement on Historic Heritage to assess this application against.

In reviewing the application documentation, the conditions outlined in Attachment C (M) Conditions of HNZPT Act Authorization (conditions 1-14) in conjunction with the Archaeological Management Plan (Attachment 17b) and the Vegetation Management Plan (Attachment 17a) are sufficient to mitigate the potential risk of archaeological 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



Plan showing earthworks extent (purple shading) in relation to the recorded archaeological sites. Source Clough and Associates 2026 (attachment 17, pg. 77).