

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: The Point Mission Bay

Fast-Track application number: FTAA-2511-1133

2.0 Technical Specialist Memo - - Mica Plowman Historic Heritage/archaeology

To: Angelika Vaze (Lead Planner) & Warwick Pascoe (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: 16/02/2026

3.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- *Substantive Application for the Point Mission Bay to Construct and Operate a Comprehensive Retirement Village (Integrated Residential Development) on the Site at 217 Kupe Street, 106 Rukutai Street, 95 Aotea Street, Rukutai Street Recreation Reserve, and Aotea Street Recreation Reserve, Orakei, Auckland.* Prepared Ngāti Whātua Ōrākei Whai Rawa Limited and Generus Living Group Limited by Bently and Co, November 2025.
- *Attachment 5: Ngāti Whātua Ōrākei Written Statement*
- *Attachment 10: Records of Title*
- *Attachment 11: Summary of Interests*
- *Attachment 13: Map of the Site*
- *Attachment 15: Archaeological Assessment -The Point, Eastcliffe: archaeological memo. Letter dated February 20th, 2024, addressed to Richard Mora (Generus Living) from D. Trillford (CFG Heritage limited).*
- *Attachment 19: Landscape Concept Plans*
- *Attachment 23: Proposed Conditions of Consent*
- *Attachment 27: Draft Earthworks Management Plan*
- *Attachment 28: Geotechnical Assessment*
- *Attachment 31: Rule Compliance 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 (January 23rd 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

The brief archaeological appraisal prepared by CFG Heritage Limited (Appendix 15) confirms that there are no recorded archaeological sites listed within the Auckland Council Cultural Heritage Inventory/Tūtangi Ora or the NZAA Site Recording Scheme within 200m of the works area. However, they do note that the land adjacent, Takaparawhau/Bastion Point, is widely accepted as a largely unrecorded archaeological landscape.

CFG Heritage Limited (CFG) concludes that there are no identified archaeological or heritage

constraints within the project area that cannot be addressed within the usual approaches for heritage management.

Although not explicitly stated in the CFG appraisal, the usual mechanisms include operating under the AUP Accidental Discovery Rule for low risk environments, supported by mitigation and recording under the HNZPT ACT (2014), should unanticipated archaeological features be uncovered by earthworks.

The CFG Heritage appraisal is a desktop study only.

I undertook a visual field inspection of the application property in December 2025. Most of the property is developed with built surfaces, limiting visibility considerably. In those few undeveloped areas where there was visibility, no archaeological features were apparent.

However, it is always possible that subsurface archaeological remains may be exposed during development due to the proximity of the development to recorded archaeological features and therefore it is recommended that a precautionary archaeological Authority under the HNZPTA is applied to mitigate the risk of discovery and avoid potential delays should sites be exposed during earthworks. This is *not* a legal requirement; it is a planning decision to be made by the applicant.

In the absence of a HNZPTA Authority, the development is required to conform to the procedures of archaeological discovery under the Accidental Discovery Rule in Chapter E11.6.1 of the Auckland Unitary Plan.

I agree with and support the CFG Heritage assessment of the potential risk to previously unidentified archaeological/historic heritage features within the development area. In my opinion, it is appropriate for the development earthworks to proceed under the provision of the AUP Accidental Rule in Chapter E11.6.1 of the Auckland Unitary Plan.

6.0 Section 67 Information Gap

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

7.0 Recommendation

Recommendations

I have assessed the effects of the proposed application The Point, Mission Bay on the 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 39-40 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

The application nominates the following conditions 39-40 (Construction Conditions, AEE, Attachment 023) to mitigate effects on historic heritage as follows:

Accidental Discovery Protocols

39. *If at any time during earthworks, sensitive material is discovered, then the protocol set out in standards E11.6.1 and E12.6.1 of the AUP must be followed. In summary, that protocol is as follows:*
- (a) *All works must cease in the immediate vicinity (within at least 20m) of the discovery and the area of the discovery must be secured including a buffer to ensure all sensitive material remains undisturbed.*
 - (b) *The consent holder must immediately advise Council in all cases, the New Zealand Police (if human remains are found), and Heritage New Zealand (if the discovery is an archaeological site, Māori cultural artefact or koiwi), and arrange a site inspection with the relevant parties.*
 - (c) *If the discovery contains koiwi, archaeology, or artefacts of Māori origin, Ngāti Whātua Ōrākei are to be provided information on the nature and location of the discovery.*
 - (d) *The consent holder must not recommence works until the steps set out in (a) – (c) have been followed, and the recommencement of works has been approved by the Council monitoring officer.*
40. *In accordance with Standards E11.6.1(2) and E12.6.1(2), for the purposes of **Condition 39** above, sensitive material includes the following:*
- (a) *human remains and koiwi;*
 - (b) *an archaeological site;*
 - (c) *a Maori cultural artefact/taonga tuturu;*
 - (d) *a protected New Zealand object as defined in the Protected Objects Act 1975 (including any fossil or sub-fossil);*
 - (e) *evidence of contaminated land (such as discolouration, vapours, asbestos, separate phase hydrocarbons, landfill material, or significant odour; or*
 - (f) *a lava cave greater than 1m in diameter on any axis.*

No amendments or additions to the proposed conditions are necessary.

9.0 Supporting Documents

Attachment 1. Location of The Point, Mission Bay development in relation to the recorded historic heritage landscape. Source Auckland Council GIS.

