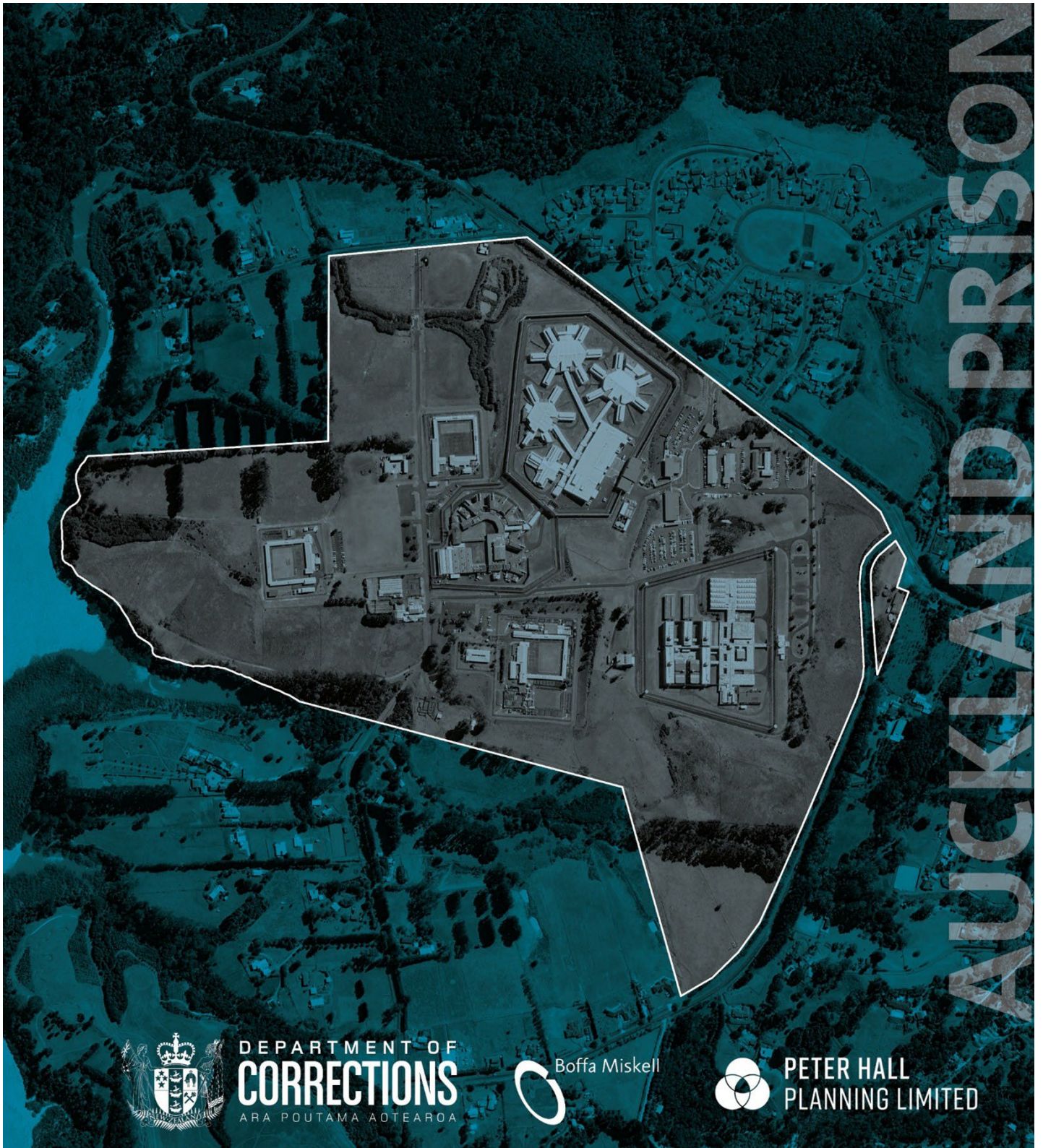


Auckland Prison Capacity Increase

Volume 5 – Appendix 5B
Archaeological Assessment



DEPARTMENT OF
CORRECTIONS
ARA POUTAMA AOTEAROA



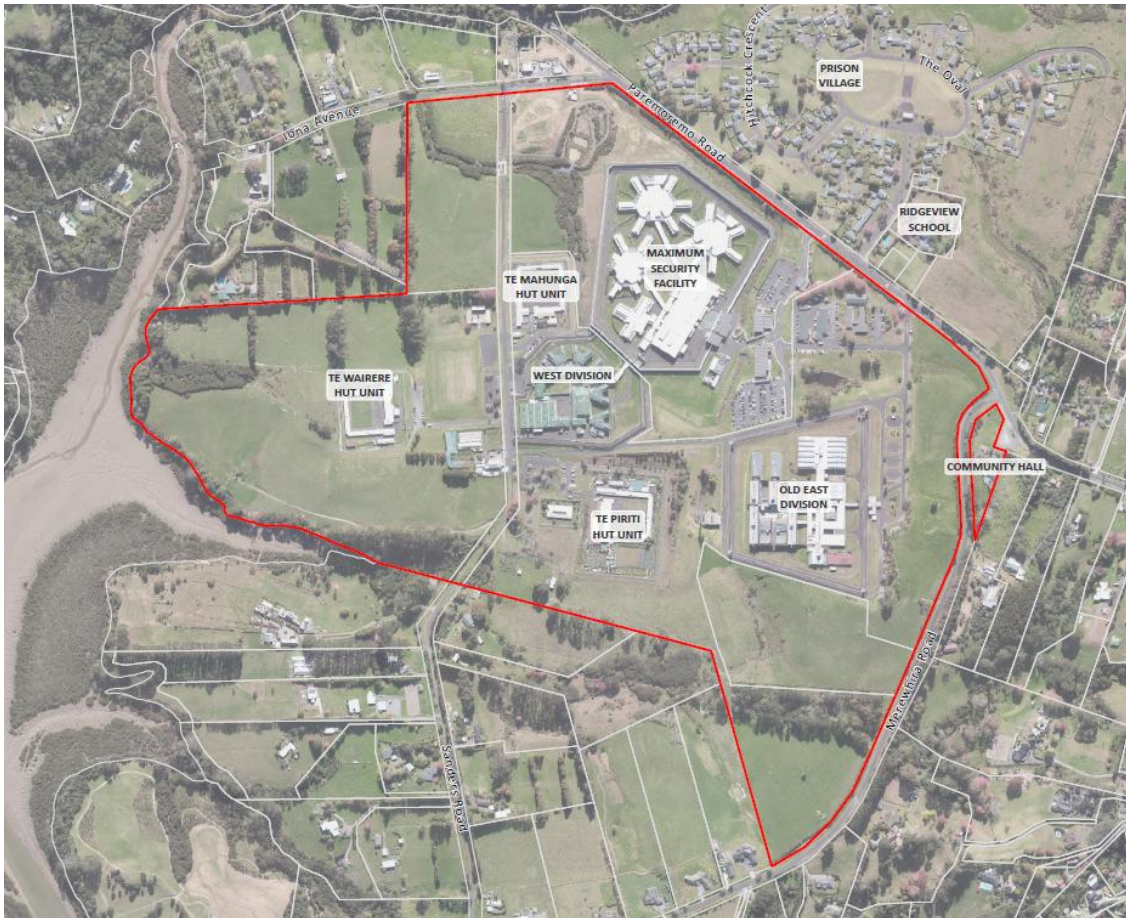
Boffa Miskell



PETER HALL
PLANNING LIMITED

AUCKLAND PRISON CAPACITY INCREASE: VOL 5 APPENDIX 5B ARCHAEOLOGICAL ASSESSMENT FOR AUTHORITY FINAL

Prepared for Department of Corrections - Ara Poutama Aotearoa
26 March 2026



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1 INTRODUCTION

1 Project Background

1. Department of Corrections - Ara Poutama Aotearoa (**Corrections**) is seeking an alteration to the Auckland Prison Designation 3900 under the Fast-track Approvals Act 2024 (FTAA) in conjunction with a number of other approvals, to enable an increase in capacity from 681 to 1,220 prisoners at the Auckland Prison site. This increase in capacity will enable new facilities for 960 prisoners to be built, which will operate alongside the existing maximum-security facility (which can accommodate 260 maximum security prisoners). The alteration to Designation 3900 is shown in Figure 1 and will be referred to as “the Site” in this report.
2. The increase in capacity may be built in stages. The area identified as Area A (approximately 44.93ha) is where Corrections proposes to construct all new secure prison facilities. Area B (approximately 3.30ha) is where Corrections proposes the development of carparking, a prisoner control point, visitor centre and associated non-secure facilities. A specific site layout and design for the proposed facility or facilities will be provided with future Outline Plans of Works. The primary vehicle access point serving the carparking area for the new facilities will be from a new access point located 150m east of the existing Iona Avenue/ Paremoro/ Brookdale Road intersection.
3. Auckland Prison is located at 530 Paremoro Road, Paremoro, Auckland and the legal description is Lot 4 DP 24508, Lot 3 DP 64525, Sect 1 SO 476557, Sect 3 SO 476557, Sect 2 SO 476557 and 505 Paremoro Road (Sec 1 SO 66966). The Site and surrounding land is zoned Rural–Countryside Living Zone under the Auckland Unitary Plan. The entire site is designated for ‘Auckland Prison’ (Auckland Unitary Plan reference 3900) with the Minister of Corrections as the requiring authority.
4. There is low potential for uncovering archaeological sites during earthworks based on the topography and evidence of past modifications from prison construction and agriculture. However, Corrections is seeking an archaeological authority for the Site under the FTAA for risk management purposes. This approach has the advantage of allowing any archaeology uncovered during the development of the site to be dealt with immediately, avoiding delays that would otherwise occur if an Authority was not applied for in advance of preliminary earthworks.
5. This assessment has been prepared to support the archaeological authority application. It provides a summary of the archaeological background, field assessments, archaeological values and provides an archaeological management plan for the site containing recommendations for the procedures to follow during earthworks and during incidental discovery of any archaeological sites.

2 Statement of Qualifications and Relevant Experience

6. This report has been prepared by Ellen Cameron, a Co-Director, Clough & Associates. Ellen's qualifications and experience are outlined in Appendix C: Expert Summary Statement along with confirmation that this report has been prepared in accordance with the Environment Court's Code of Conduct for Expert Witnesses.

3 Purpose of this Report

7. This archaeological assessment was commissioned by Corrections to establish whether proposed enabling works for the capacity increase will affect archaeological values. The built form for the developed site will be confirmed in future, within the Site with proposed works area is shown in Figure 1. The proposed works in Area A will consist of build platforms and levelling works and Area B will consist of the construction of a car park, pavements and localised control buildings. Works in Area C will consist primarily of landscaping and planting, with provision made also for certain infrastructure such as stormwater ponds and there are currently no specific works planned in Area D, although its continued use as a community hall and possible redevelopment for community purposes is enabled by the alteration to the designation being sought.
8. As there are no details on the layout and design, the potential extent and depth of earthworks have been based on a range of assumptions, with reference to the proposed development parameters for the designation alteration.
9. This report has been prepared as part of the Substantive Application under the Fast-track Approvals Act 2024 to support an application for an archaeological authority.

4 Description of works and scope of Archaeological Authority

10. The scope of the archaeological authority is to cover the Site as shown by the red outline on Figure 1 and in the Site Plan for Archaeological Authority, prepared by Boffa Miskell (Figure 57). A description of the types of activities expected to occur in the different areas and the land disturbance associated with the activities is provided in Table 1 below. These works will require topsoil stripping and would result in damaging or destroying any archaeological sites that may be present.
11. The archaeological site on the Site (as discussed in section 4) will be avoided and a 10m setback will be provided during earthworks. The archaeological authority is being sought by Corrections as a precaution for risk management purposes to minimise delays if archaeological remains are exposed once works are underway. Disturbance to the recorded archaeological site (R10/831) does not form part of this application because the recorded site will be avoided.
12. The archaeological authority seeks a duration of 25 years from the date of commencement under Schedule 8, clause 6 of the FTAA.

Table 1. Proposed development activities and indicative land disturbance (see Figure 2)

Area	Types of activities	Extent of previous land disturbance	Indicative average extent of land disturbance	Likelihood of undisturbed archaeology	Relationship with the proposed archaeological monitoring areas (Appendix D)
Area A	Secure facilities and non-secure facilities	Parts of Area A are already highly modified and set back from the coast with a lower risk of presence of archaeological features. Area A is the location of all existing prison facilities.	1-2 metres with localised areas of greater earthworks depth in particular for building foundations, retaining, batter slopes and/or infrastructure.	Low due to land being highly modified and set back from the coast.	There are two areas on the western side of Area A that require archaeological monitoring.
Area B	Non-secure facilities including carparking, a visitor centre and prison control point.	Parts of Area B are already highly modified and set back from the coast with a lower risk of presence of archaeological features.	0.75 – 1.25 metres	Low due to land being highly modified and set back from the coast.	Archaeological monitoring is required on the western side of Area B.
Area C	“Balance land activities” including: <ul style="list-style-type: none"> • Landscape revegetation and tree planting; 	Parts of Area C including those along the Paremoremo Creek are largely unmodified.	Variable (may involve depths of approximately 1.5m in localised areas for retaining, batter slopes or infrastructure).	Moderate likelihood of finding undisturbed archaeology. The main area of archaeological interest is along and in proximity to Paremoremo Creek and streams in Area	Archaeological monitoring is required along the creek and streams that run through Area C.

Area	Types of activities	Extent of previous land disturbance	Indicative average extent of land disturbance	Likelihood of undisturbed archaeology	Relationship with the proposed archaeological monitoring areas (Appendix D)
	<ul style="list-style-type: none"> • Farming; • Surveillance equipment and lighting; • Vehicle accessways; • Infrastructure and services (including water, wastewater and stormwater facilities); • Cultural buildings; • Offender employment activity; and • Energy generation and storage facilities. 			<p>C, some distance from the proposed development areas A and B and the proposed works in Area C consists of revegetation planting, which should avoid any archaeological sites if encountered.</p>	

Area	Types of activities	Extent of previous land disturbance	Indicative average extent of land disturbance	Likelihood of undisturbed archaeology	Relationship with the proposed archaeological monitoring areas (Appendix D)
Area D	<ul style="list-style-type: none"> Staff training facilities, ongoing use and potential redevelopment of community facilities, infrastructure/ services, carparking and lighting. 	Largely modified due to use as community facility, carpark and wastewater disposal tanks and areas.	0.75 – 1.25 metres	Low due to land being highly modified and set back from the coast.	No archaeological monitoring is required in Area D.

5 Methodology

13. The methodology for this report has relied upon desk-based research and archaeological survey as presented below.
14. The New Zealand Archaeological Association's (NZAA) site record database (ArchSite), Auckland Council's Cultural Heritage Inventory (CHI), Auckland Unitary Plan Operative in Part (AUP OP) schedules and the Heritage New Zealand Pouhere Taonga (Heritage NZ) New Zealand Heritage List/Rārangī Kōrero were searched for information on sites recorded in the vicinity. Literature and archaeological reports relevant to the area were consulted (see Bibliography). Early survey plans and aerial photographs were checked for information relating to past use of The Site. Archival research was carried out to establish the history of the properties included in the Site.
15. A visual inspection and minor subsurface testing with a probe and spade of the undeveloped parts of the Site in areas that were determined to have archaeological potential was conducted on 20 February and 25 August 2025 with surveyed areas shown in Figure 2. Areas that were found to contain buildings, areas that were shown to have undergone previous earthworks on aerial photographs and areas that were included in previous surveys were not included because these are already modified therefore highly unlikely to contain archaeological features. It is noted that the surveyed areas were for the most part outside of Area A and Area B, largely because areas within Areas A and B are already highly modified and set back from the coast with a lower risk of presence of archaeological features. Planting and other activities are proposed in Area C (refer Table 1 above), which has the potential to affect any archaeological sites that are present.
16. The ground surface was examined for evidence of former occupation (in the form of shell midden, depressions, terracing or other unusual formations within the landscape relating to Māori occupation and settlement, or indications of 19th century European settlement remains). Exposed and disturbed soils were examined where encountered for evidence of earlier modification, and an understanding of the local stratigraphy. Subsurface testing with a probe and spade was carried out over the property area to determine whether buried archaeological deposits could be identified or establish the nature of possible archaeological features. Particular attention was paid to the spur and ridge lines and creek/stream banks (topographical features where archaeological sites are often found to be located). Sites were photographed and site record forms (SRFs) were updated. Photographs were taken to record the area and its immediate surrounds.



Figure 1. Aerial plan showing the location of the Site outlined in red (source: Boffa Miskell)

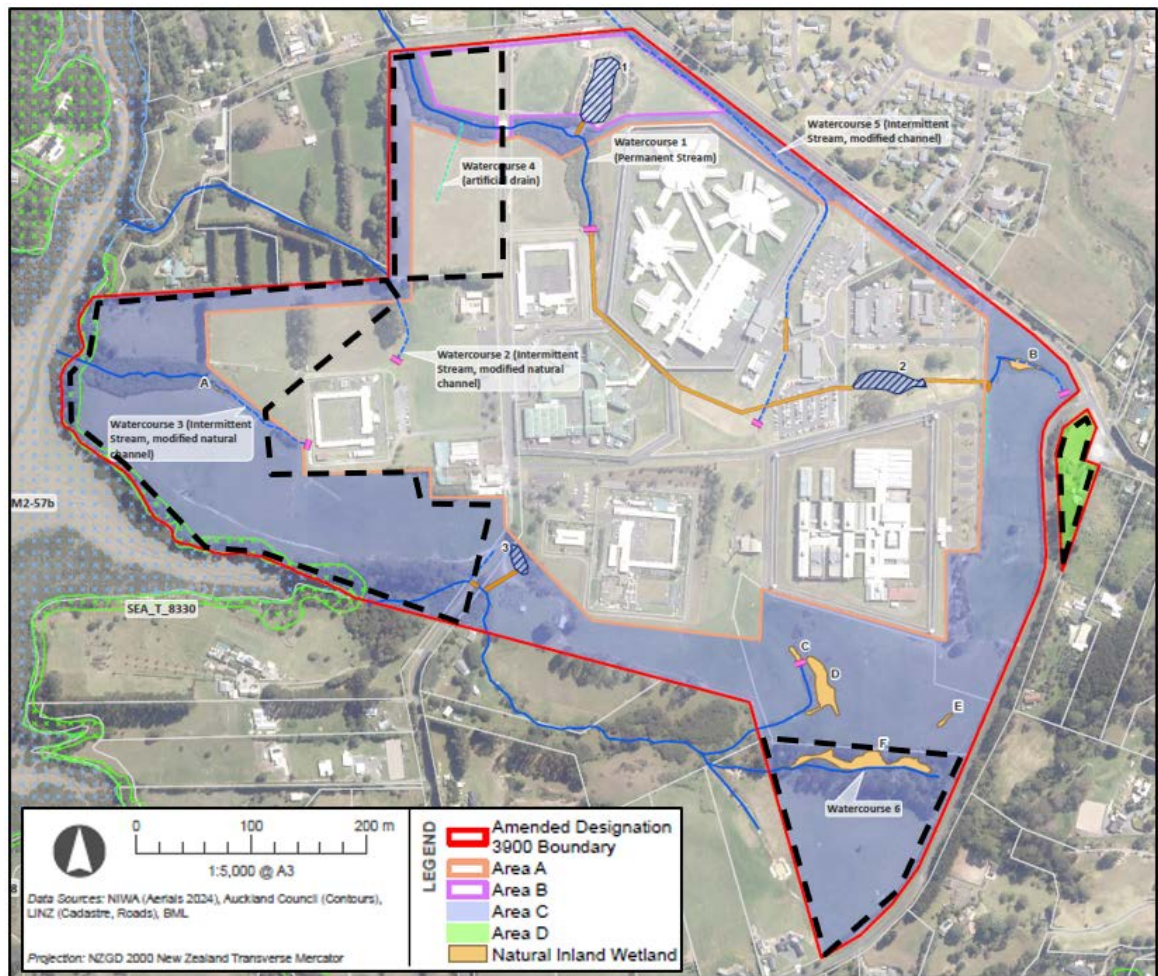


Figure 2. Aerial plan showing the Auckland Prison site (the Site) outlined in red with areas covered by the 2025 surveys outlined by black dashed lines (source: Boffa Miskell)

2 HISTORICAL BACKGROUND¹

6 Māori Settlement

17. Tāmaki-makau-rau was a very favourable area for settlement by Māori from the earliest times, with its rich and easily accessible marine resources and its extensive volcanic fields which provided excellent agricultural soils. The distribution of archaeological sites of pre-European date on the Isthmus reflects the general pattern of settlement: shell midden and settlement sites around the coast and along the waterways leading inland; garden areas around the volcanic cones and other inland areas; and defensive settlement on higher points and particularly concentrated on the volcanic cones themselves. These catchments combined access to marine resources, agricultural soils, fresh water and communication routes via harbours, waterways and overland.
18. The Riverhead, Paremoremo, Greenhithe area, Te Atatu, West Harbour and other locations along the creeks and inlets of the inner reaches of the Waitematā Harbour, were occupied by Māori for generations before the arrival of Europeans, evidence of which survives in the form of recorded place names, oral traditions and archaeological sites (although many have been destroyed by 19th and 20th century development and natural processes). Lucas Creek, known to Māori as Kaipātiki (Madden 1966) provided a feeding ground to flatfish. Additionally a number of shellfish species inhabited the creek, and bird life would have been abundant in the forests, all providing a rich source of protein.
19. A number of Māori place names were recorded by L.G. Kelly in 1929 in the Auckland region, including at Paremoremo as shown in Figure 3 (Simmons 1980). These include Te Uru Kowhai, a headland on the east side of Paremoremo Creek, Te Ara Huri Haere, a Māori track that would have crossed the property in the past and Te Pā Tuna Pi, that was located at the turn of the creek to the west of the Auckland Prison site.

7 European Settlement

20. The Mahurangi purchase by the Crown took place in 1841. The area contained vast swathes of forest, and a thriving timber industry soon emerged to satisfy the demand for construction materials for building at Auckland. At Paremoremo, the principal early Pakeha land holders were the Sheehan family to the west of Paremoremo Creek, and John and Mary Faire to the east of the Creek. Timber operations at Paremoremo reached their peak in the period 1841-1846 (Madden 1966:45), and timber in the area was largely cut out by 1857, with timber operations moving northwards to what are now the Albany, Wairau Valley and Northcote areas of the North Shore. The upper harbour stations became the haunts of runaway sailors, convicts and military deserters who worked as timbermen and sawyers (*ibid.*).

¹ This section is adapted from Bickler and Clough 2014 and Felgate 2013.

21. After the forests were cleared, the land was used for grazing cattle until the rise of the kauri gum industry which emerged in the 1860s. There is no evidence that the land in the Auckland Prison site was used for grazing, as a hydrographical survey by the 'Pandora' in the 1850s described the land around Paremoro as being fern land rather than pasture (Figure 4).
22. The Kauri gum era is thought to have involved fairly major diggings, later mostly obliterated when the land was rehabilitated to pasture, but the Auckland Prison site is not known to have been the particular focus of either gum-diggers' camps or gum digging. The former Jonkers farm to the west of the Paremoro Creek is thought to have been the focus of local gum-digging activities (Madden 1966: 113).

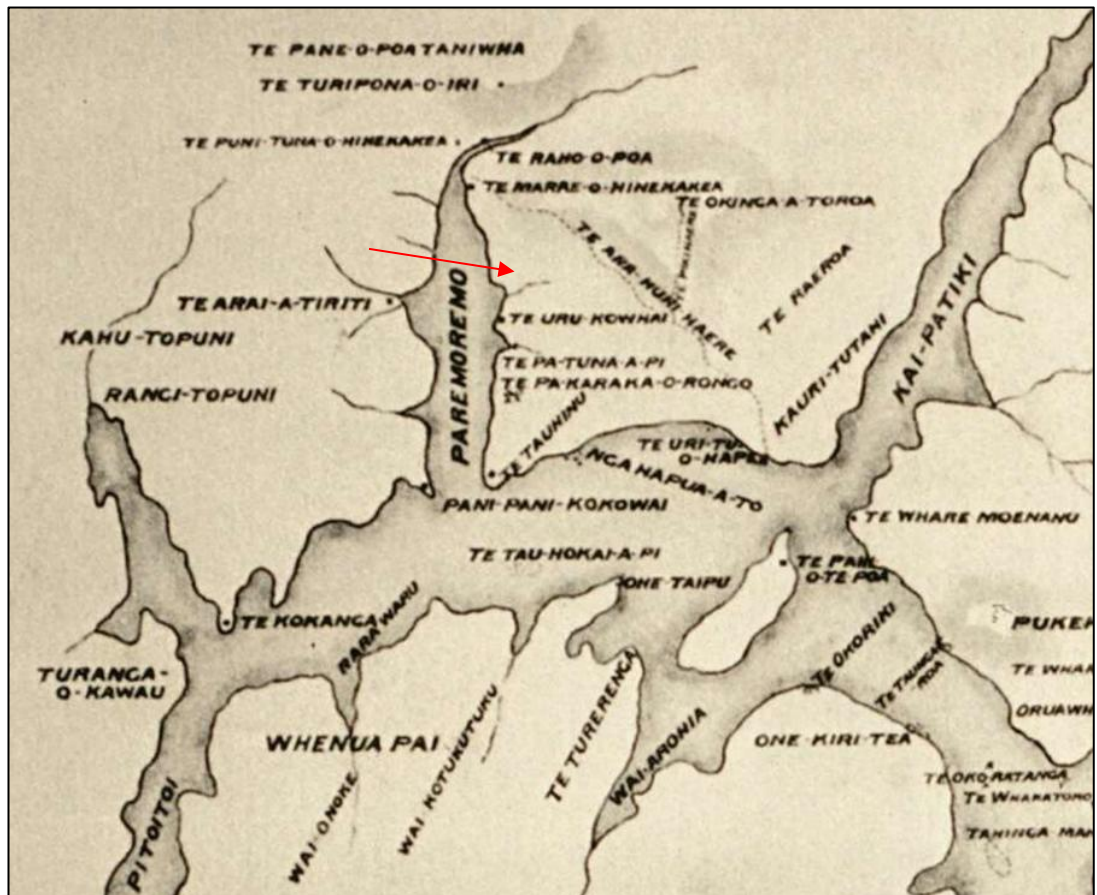


Figure 3. Māori place names of the Paremoro area with the Site indicated by arrow (source: detail from Kelly 1929 in Simmons 1980)



Figure 4. Detail from map titled ‘Waitemata River from Kauri Point Auckland Harbour to its sources, surveyed by Comr. B. Drury and the officers of H.M.S. Pandora 1854’, with the Auckland Prison site described as ‘Undulating Fern Land’ indicated by arrow (source: Auckland Libraries Heritage Collections Map 3909)

3 HISTORICAL SURVEY

8 Information from Early Maps, Plans and Archival Research

23. Early maps and plans were reviewed along with archival research to gather information on the past ownership and land use in the Site.
24. OLC 329, surveyed in 1846, was the earliest relevant map of the area, and showed the land on which the Auckland Prison sits belonging to Mrs Mary Faire (Figure 5). John and Mary Faire were involved in timber operations at Paremoremo from some time before 1844 and secured a waiver of the Crown's right to pre-emption of Māori Land purchases, purchasing 800 acres from Ngāti Whātua. John Faire was involved in logging, lumber sawing and cattle grazing at Paremoremo when he was drowned. His widow Mary Faire continued to farm and cut timber, and subsequently married Maurice Kelly, who became the major timber operator in the area.
25. The plan dated 1848 in Figure 6 shows the Site in part of Allotment 8 which has the annotation 'M. Kelly'. However, in 1849, Mary Faire conveyed 500 acres of Allotment 8 Parish of Paremoremo to the Crown in exchange for Allotment 11 Parish of Paremoremo (DR 1D/220, Archives NZ). On 2 May 1873 Mary and Maurice Kelly conveyed several pieces of land to themselves and Walter Lee, of Auckland, surgeon, as Trustee (DR 28D/447, Archives NZ). It would seem that Kelly repurchased Allotment 8 at some point, as on 13 May 1880 Kelly conveyed Allotment 8 to James Wallis of Auckland, gentleman, for the sum of £204 (DR 32D/881, Archives NZ). On 12 March 1896, 408 acres of Allotment 8 was conveyed to Adrian Edgar Richards and Eugene Richards of Auckland, settlers, for the sum of £850 (DR R51/429, Archives NZ).
26. The 1922 map in Figure 7 shows planned roads in the area including through Allotment 8 and Allotment 109, which established Paremoremo Road and Sanders Road. The plan has the name 'Richards' annotated on part of Allotment 8 and 'E.C. Dennis' on Allotment 109.
27. The 1930 plan in Figure 8 shows the subdivision of parts of Allotment 8 with the Site being located in lots 3, 4, 5 and 7 to the southwest of Paremoremo Road. The Site also includes part of Allotment 109 (i.e. the property at 505 Paremoremo Road). The properties are described as 'Grass and Small Scrub Land' and two streams are shown, one running through what is now Sec 1 SO 476557 in the central part of the Site and one in the southern part of the Site.
28. No buildings are shown on any of the plans discussed above.

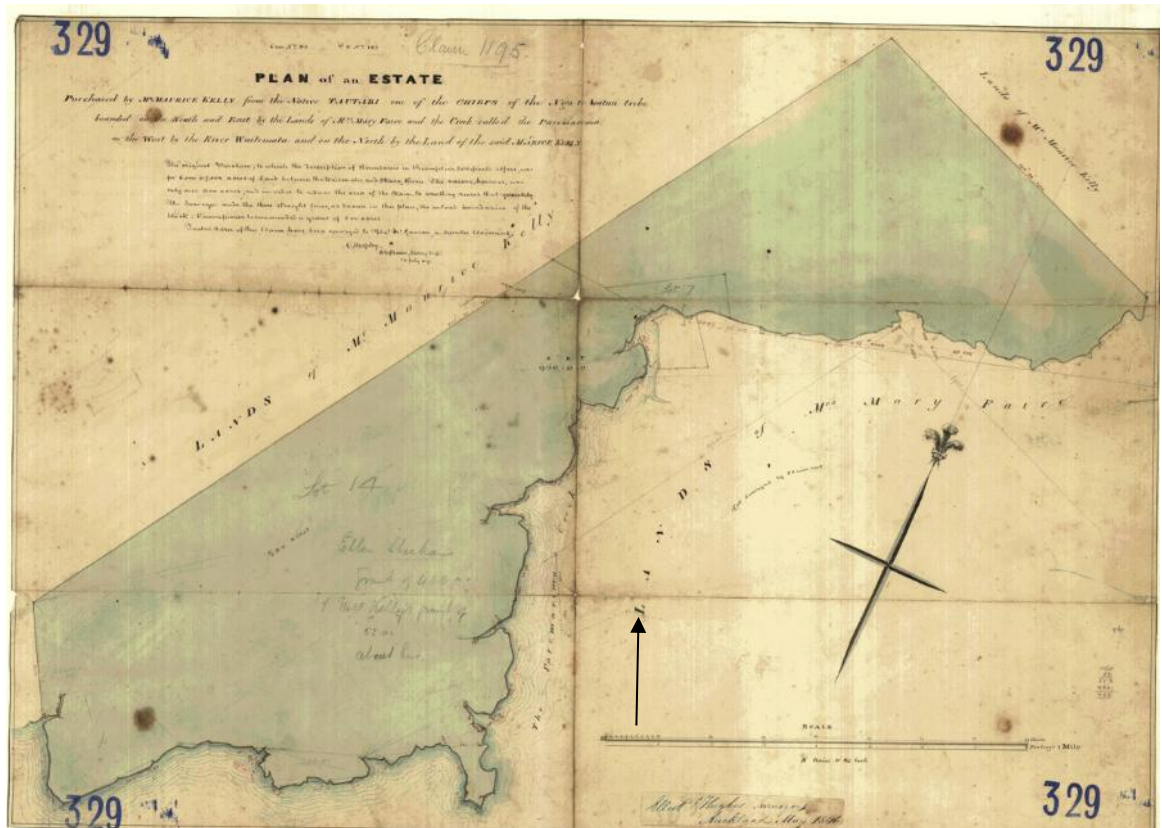


Figure 5. OLC 329 plan dated 1846 showing the land to the east of Paremoremo Creek annotated as 'Lands of Mrs. Mary Faire' (indicated by arrow) (source: Quickmap)

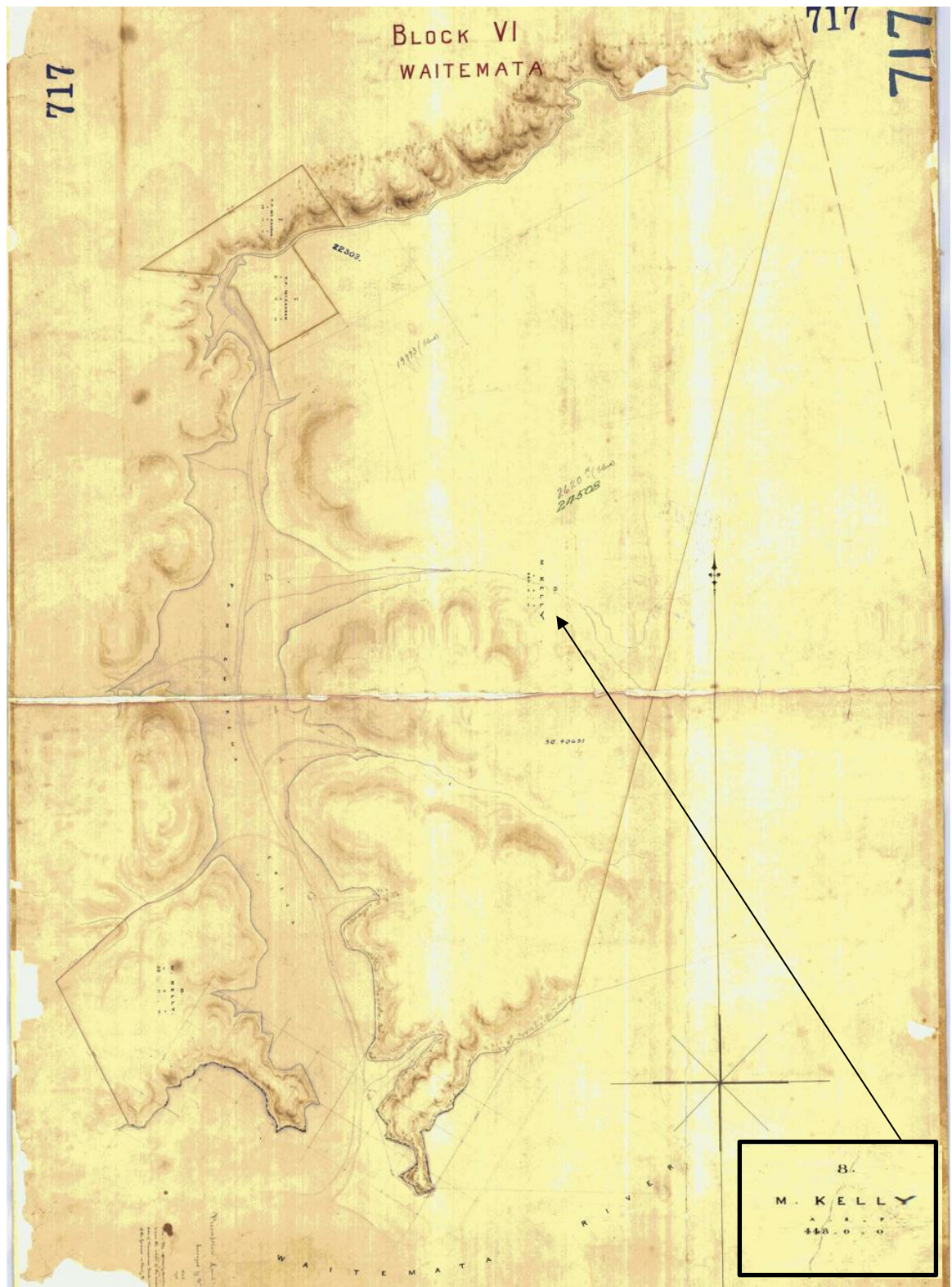


Figure 6. AK SO 717 plan from an 1848 survey showing the land to the east of Paremoremo Creek owned by M. Kelly, including the Site (source: Quickmap)



Figure 7. AK SO 22303 plan dated 1922 with the property containing the Site described as ‘Undulating Country’ and with the names ‘Richards’ and ‘Reilly’ annotated as the owners (source: Quickmap)

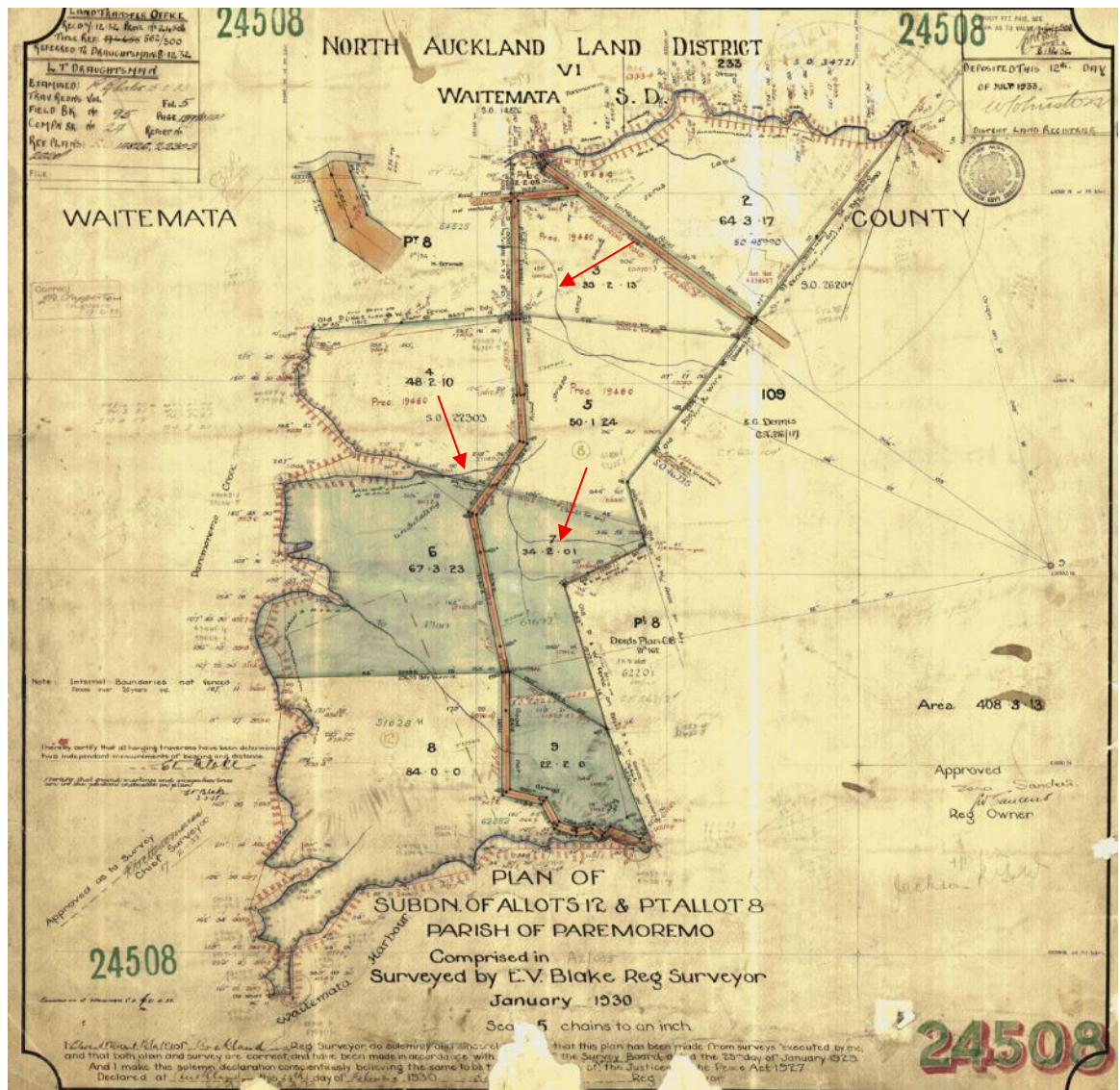


Figure 8. AK DP 24508 dated 1930 showing a subdivision including the Site, now contained in lots 3, 4, 5 and 7 DP 24508 and in part of Allotment 109 with streams indicated by arrows (source: Quickmap)

4 ARCHAEOLOGICAL BACKGROUND

9 Recorded Archaeological Sites

29. There is one recorded archaeological site within the Site. This is (R10/831) and there are 11 additional sites in the vicinity outside of its boundary (within c.700m) (excluding those on the other side of Paremoremo Creek). These are shown in Figure 9, with a brief description provided in Table 2. The recorded site within the Site is R10/831 (CHI:11184), a shell midden located on a possible terrace cut into the bank along the western coastal boundary of the Site. The archaeological site was noted to contain crushed cockle, identified through probing and a test pit (see Appendix A for site record form (SRF)).
30. The majority of the 11 sites in the vicinity but outside of the Site are also shell middens, the main exception being R10/163, which is the site of a Māori village (kāinga), Te Marae o Hinekakea. It is located to the north and west of the Site on a large flat piece of land near a bend in Paremoremo Creek at a minimum distance of c.370m. Identified archaeological remains include midden and oven stones in darkened soil near the shoreline. As well, historic ceramics and glass have been found. This archaeological site also includes the grave of Manhi Hapi, who was the brother-in-law of George Graham, who owned the property from 1908 to 1932. Graham was an ethnographer who recorded Māori place names in Auckland as well as a lawyer who wrote articles on Māori subjects. The archaeological site is also included in Schedule 14.1 Schedule of Historic Heritage in the AUP OP ID: 0729 and in the Auckland Council Cultural Heritage Inventory (CHI) ref:7103.
31. R10/886 and R10/887 are both recorded as shell middens and R10/886 also with a possible terrace cut into the creek bank. They are located to the south of R10/163 along the edge of Paremoremo Creek in the Paremoremo Creek Esplanade Reserve. R10/886 was found to contain a small amount of crushed shell and fire cracked rock on a possible terrace c.4 x 3m in size on a small point of land jutting out above the creek. R10/887 is a shell midden located just to the north of the Site at the mouth of an ephemeral stream which feeds into a small tidal inlet of Paremoremo Creek. Crushed shell, charcoal and fire cracked rocks were identified. The SRFs also note that both sites would have been easily accessed by canoe. The sites are also included in the CHI – refs:11238 and ref:11239, respectively.
32. R10/1475 and R10/1476 are both shell middens recorded to the northeast of the Site alongside of a stream, at distances of C.80m and 300m. R10/1475 is recorded as traces of cockle midden situated c.20m up slope of the stream. R10/1476 is located to the west of site R10/1475 along the same stream and is also described as traces of cockle midden exposed over 2m along the edge of a walking track about 8m above the stream. They are also included on the CHI – refs: 22841 and 22842, respectively.
33. Site records from NZAA ArchSite indicate that survey for a gas pipeline on the eastern side of the Paremoremo Creek was undertaken and several midden sites were identified in 1996 by Jeff Mosen of Bioresearches. The SRFs, however, only provide a GPS location with no description or other information and as such the exact locations and

extents remain unknown. These sites are R10/1200 (CHI:17809), R10/1201(CHI:17810) and R10/1202 (CHI:17812). As well, the SRFs for sites R10/1168 (CHI:17711), R10/1169 (CHI:17712) and R10/1199 (CHI:17808) also only provide a GPS location with no details or information on when they were recorded.



Figure 9. Map showing the locations of the recorded archaeological sites within and in the vicinity (within c.700m) of the Site (source: NZAA Archsite Website)

10 Other Historic Heritage Sites

34. All of the above archaeological sites are also included on the Auckland Council Cultural Heritage Inventory (CHI) along with one additional site. This is CHI: 17811, which is a maritime site recorded as a landing on Paremoremo Creek. It is located along the eastern side of the creek, c.170m to the north of the Site. The location of the landing is shown in Figure 10 and a brief description is included in Table 2. It should be noted that site R10/831 is incorrectly located on the map in Figure 10 because of an administrative error.

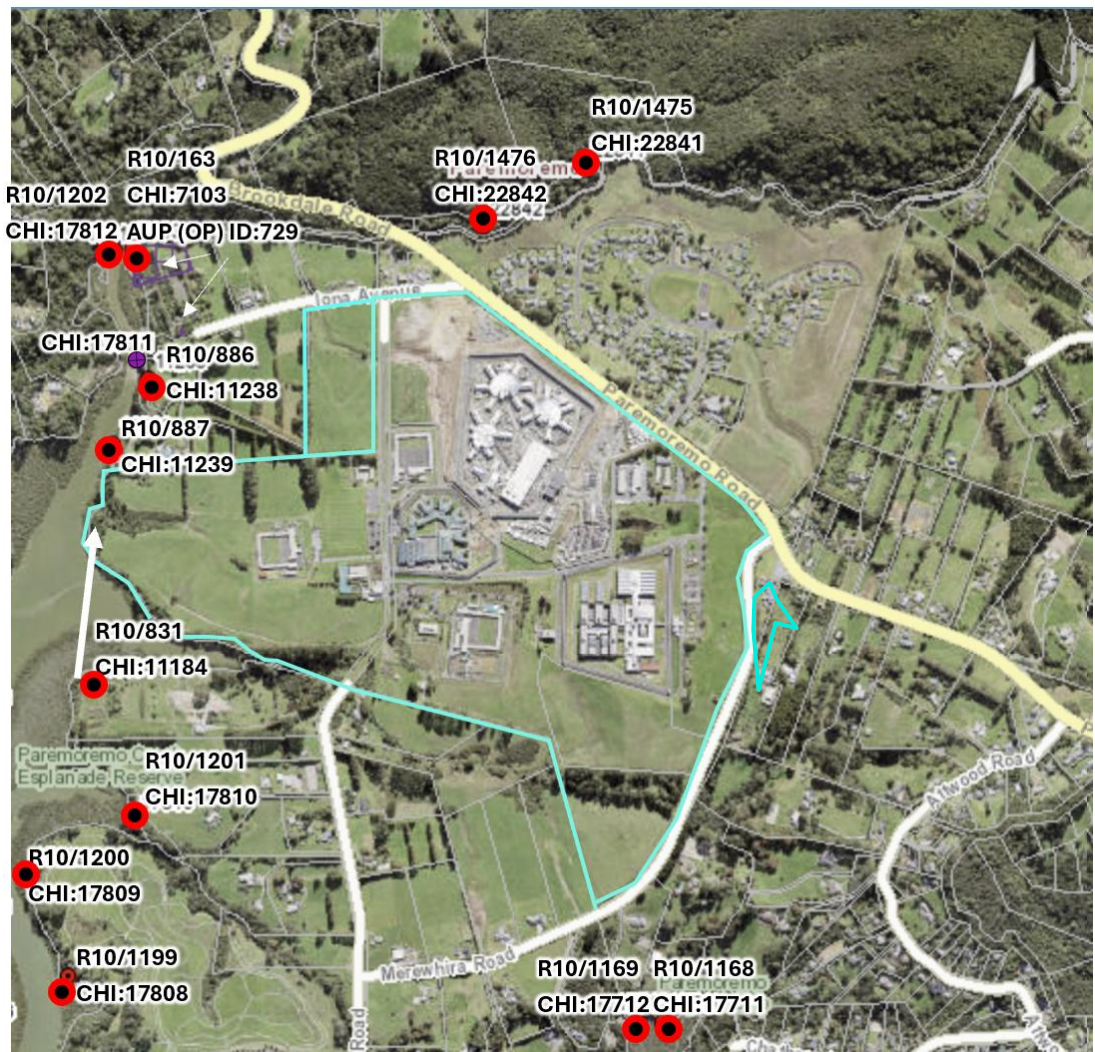


Figure 10. Aerial plan showing the locations of the recorded archaeological sites in the vicinity of the Site which is outlined in turquoise – note the location of R10/831 is incorrectly located on this map with correct location shown in Figure 9 and indicated by the white arrow (source: Auckland Council GeoMaps)

Table 2. Brief description of the recorded archaeological and historic heritage sites within and in the vicinity (within c.700m) of the Site with the archaeological site located within The Site shaded grey

NZAA Ref	CHI Ref (AUP (OP) ref)	Site Type	Description	NZTM Easting	NZTM Northing
R10/163	7103 0729 (Cat B)	Site of Māori Village and Grave	Te Marae o Hinekakea Village Site Grave of Manahi Hapi	1746013 1746112	5931333 5931171
R10/831	11184	Pit/ Terrace	A west facing terrace above creek bank (10m long and 5m wide cut into the bank) midden present	1745945	5930478
R10/886	11238	Pit/ Terrace	Possible terrace (4 x 3m) with small amount of crushed shell visible	1746044	5931078
R10/887	11239	Midden/ Oven	Small amount of crushed shell, charcoal and fire cracked rock noted.	1746044	5930978
R10/1168	17711	Midden/ Oven	No information available	1747048	5929821
R10/1169	17712	Midden/ Oven	No information available.	1746998	5929822
R10/1199	17808	Midden/ Oven	No information available	1745888	5929912
R10/1200	17809	Midden/ Oven	No information available	1745808	5930106
R10/1201	17810	Midden/ Oven	No information available	1746015	5930216
R10/1202	17812	Midden/ Oven	No information available	1745979	5931327
R10/1475	22841	Midden/ Oven	Traces of cockle midden with fire cracked rock	1746900	5931491
R10/1476	22842	Midden/ Oven	Traces of a cockle midden exposed over a 2m area	1746699	5931376
n/a	17811	Maritime Site	Landing	1746022	5931115

5 PHYSICAL ENVIRONMENT

11 Topography, Vegetation and Landuse

35. The Site is located along the Paremoremo Creek in the upper Waitematā Harbour. Soils are heavy clay and ground coverage consists of pasture for cattle. The streams in the Auckland Prison site are shown in Figure 11. The aerial plan with contours in Figure 12 shows an undulating landscape with steep hillsides in the southeastern part. It also shows steep banks leading down to Paremoremo Creek along the western side and to an inlet of the creek along the southwestern boundary.

12 Previous Modifications

36. Parts of the Site have been earthworked since the building of the original prison in the late 1960s and there have been substantial earthworks since then for new infrastructure. Aerial photographs were reviewed to identify the areas which have been modified in the past. The aerial photographs in Figure 13 from 1940 and 1963 show the Site prior to prison construction. As can be seen the property consisted of grassed paddocks in 1940 and that a farmhouse and outbuildings alongside a stream and bordered by trees had been constructed by 1963. The aerial photographs also show a few scattered farm buildings to the south. As well, 505 Paremoremo Road does not contain any buildings in the 1963 aerial photograph.
37. The 1968 aerial photograph in Figure 14 shows the works for the prison facility as it existed at that time. The farmhouse and outbuildings are still present at this time. By 1973 (Figure 15) some prison facilities are completed, although the farmhouse and its curtilage appear unmodified. There is also a building present to the west of Sanders Road near the junction of Iona Avenue in Lot 3 DP 64525.
38. The 1988 aerial photograph in Figure 16 shows that additional Prison facilities have been constructed and also a building present at 505 Paremoremo Road. The aerial photograph dated 1997 in Figure 17 also shows the expanded prison facilities and that some of the paddocks in the western side of the area to the southwest of Paremoremo Road are under cultivation. Finally, the aerial photographs in Figure 18 dated 2015 and 2017 show the earthworks undertaken for the development of the new Maximum Security Facility in the northern part of the Site. It is noted that the latter two aerial photographs show that the streams in the northern part of the Site have been affected by these earthworks.

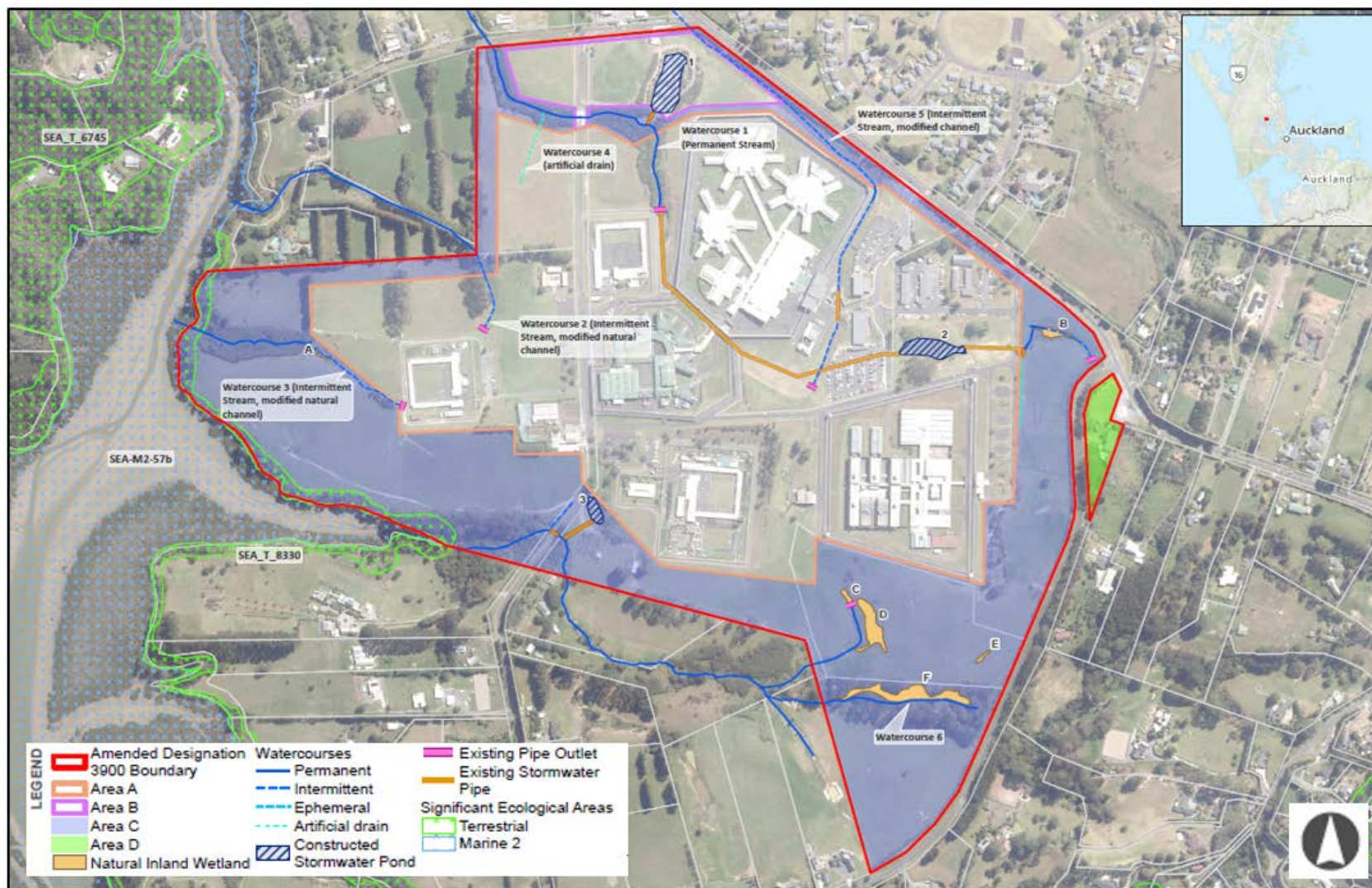


Figure 11. Aerial plan showing streams (blue lines indicated by arrows) in the Site which is outlined in red (source: Auckland council GeoMaps)



Figure 12. Aerial plan with contours showing the Site outlined in yellow (source: Auckland Council GeoMaps)

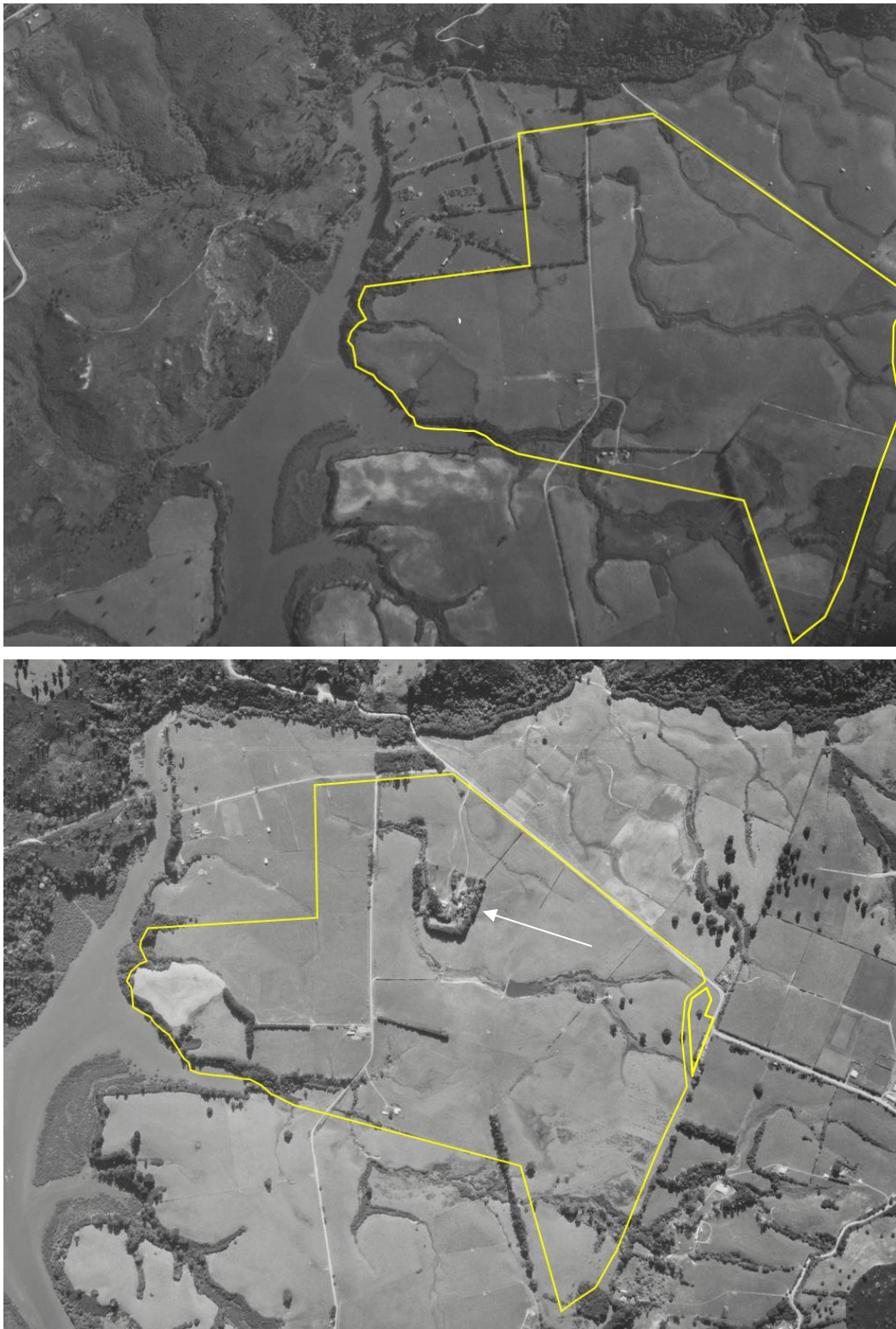


Figure 13. Upper aerial photograph dated 1940 (Crown 143 90 24) showing the Site (outlined in yellow) prior to the construction of the prison with farmhouse in the central part and lower aerial photograph dated 1963 (Crown 1392 3229 32) showing that the farmhouse was present at that time (indicated by arrow) (sourced from: [http:// retrolens.nz](http://retrolens.nz) and licensed by LINZ CC-BY 3.0)



Figure 14. Aerial photograph dated 1968 (Crown 1875 5043 14) showing the works for the prison in the eastern part of the Site which is outlined in yellow (indicated by arrow) (sourced from: <http://retrolens.nz> and licensed by LINZ CC-BY 3.0)

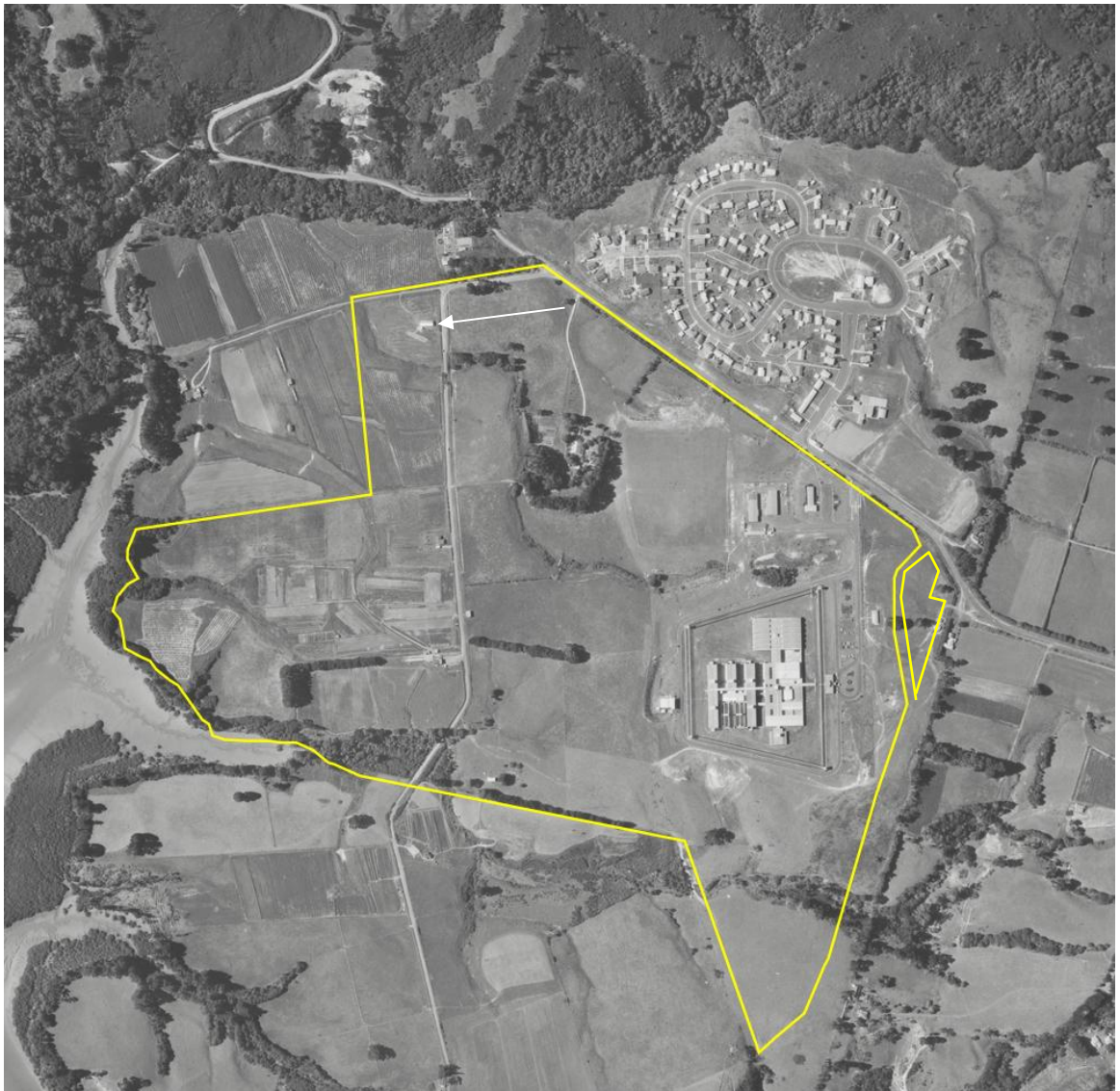


Figure 15. Aerial photograph dated 1973 (Crown 3618 4649 6) showing the Site (outlined in yellow) with evidence of cultivation activities in the western part and a building now present in Lot 3 DP 64525 (indicated by arrow) (sourced from: [http:// retrolens.nz](http://retrolens.nz) and licensed by LINZ CC-BY 3.0)



Figure 16. Aerial photograph dated 1988 (Crown 8772 G 10) showing the Site (outlined in yellow) with additional prison structures present (sourced from: [http:// retrolens.nz](http://retrolens.nz) and licensed by LINZ CC-BY 3.0)



Figure 17. Aerial oblique photograph dated 1997 showing areas of cultivation visible in Lot 3 DP 64525 (red arrow) and in the western part of the Site near Paremoremo Creek in Lot 4 DP 24508 (yellow arrows) (source: Google Earth)



Figure 18. Upper oblique aerial photograph dated 2015 and lower aerial photograph dated 2017 showing the northern part of the Site with earthworks visible (source: Google Earth)

6 FIELD ASSESSMENT

13 Field Survey Results

39. Two surveys have been previously undertaken for expansion of prison facilities, one in 2013 and one in 2014. A survey was also undertaken for the current assessment. The results of the earlier two surveys are summarised below for reference and the detailed survey information for the current survey is also provided below. The survey for the current assessment concentrated on undeveloped areas. Areas that were found to contain buildings, the parts of Area A and Area B that were included in previous surveys and areas that were shown to have undergone previous earthworks on aerial photographs were not included because these are already modified therefore highly unlikely to contain archaeological features. It is noted that the surveyed areas were for the most part outside of Area A and Area B, largely because areas within Areas A and B are already highly modified and set back from the coast and the stream running through Area A has been previously modified by earthworks, thus creating a lower risk for the presence of archaeological features. As Area C is largely proposed to be planted, this area was also included in the survey surveyed as the planting activities have the potential to affect any archaeological sites that are present.

Results of the 2013 Archaeological Survey

40. The survey consisted of a site walkover which was carried out in April 2013 (Felgate 2013) with the general area covered by the survey shown in Figure 190. The survey attempted to identify and concentrate on relatively unmodified areas as it was noted that some areas were modified in the form of cut works for terracing that had occurred for the construction of the older prison facilities. It was also noted that the ground was very dry during the survey which hindered probing; however, it was noted that there was minimal grass cover and that pugging by cattle had exposed the upper soil levels, so that if shell midden was present, it would likely have been visible. Some fragments of shell mixed in with modern building debris were identified in a previously disturbed area (labelled 10 in Figure 19) which was not deemed to be archaeological in nature.
41. No archaeological features or deposits were identified during the survey in the proposed development area covered by the assessment and site R10/831 was not able to be relocated.

Results of the 2014 Archaeological Survey

42. An archaeological survey was undertaken in July 2014 of the area shown in Figure 20. Probing and test pitting was undertaken; however, it was quickly noted that the top 50cm of soil in much of the proposed construction zone had been modified by previous earthworks. The typical soil profile showed clay and topsoil mixed together with gravel and other debris present in exposed soil. No archaeological features or deposits were identified during the survey (Bickler and Clough 2014: 14)



Figure 19. Aerial plan showing the areas that were photographed during the 2013 survey (source: Felgate 2013:16)



Figure 20. Aerial plan showing the assessment area that was included in the 2014 survey (Auckland GIS Viewer)

Results of the 2025 Archaeological Survey

43. The survey carried out at Auckland Prison for the current assessment was undertaken on 20 February 2025 by Jen Low and Kirstin Roth under clear, dry conditions and for Area 4 on 25 August 2025 by Ellen Cameron also under clear, dry conditions. The survey area covered undeveloped areas in the Auckland Prison site that were found not to have undergone previous modifications from earthworks based on the review of aerial photographs and previous survey details, thereby having higher potential for archaeology features. Modified areas not shown in yellow shading in Figure 19 did not require archaeological survey as there was low potential for archaeological features due to previous excavation activities. Four areas were surveyed (Figure 21), with Area 2 having a frontage to the Paremoremo Creek. Area 1 was bisected in the northern part of the area by a watercourse (artificial drain) leading to a culvert underneath Iona Avenue. Area 3 is located on the southeastern edge of the prison site on Merewhira Road and has a permanent watercourse passing through the northern portion. Area 4 currently contains a community hall. Eight test pits were undertaken (also shown in Figure 21), seven to determine the nature of the subsoils and one (TP2) to confirm the location of a previously identified archaeological site (R10/831).
44. Reference to the watercourses discussed in this section are shown in the ecology map in Figure 22.

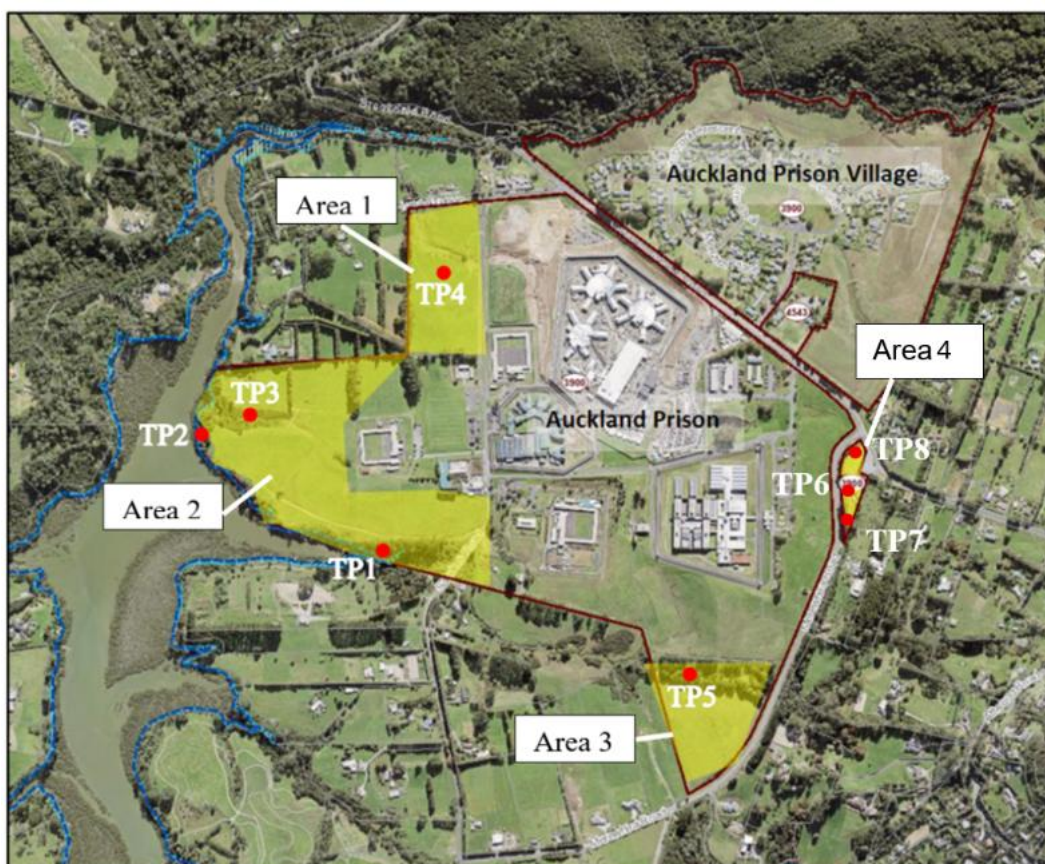


Figure 21. Aerial plan showing the areas surveyed in 2025 shaded yellow with test pits numbered (source: Boffa Miskell)

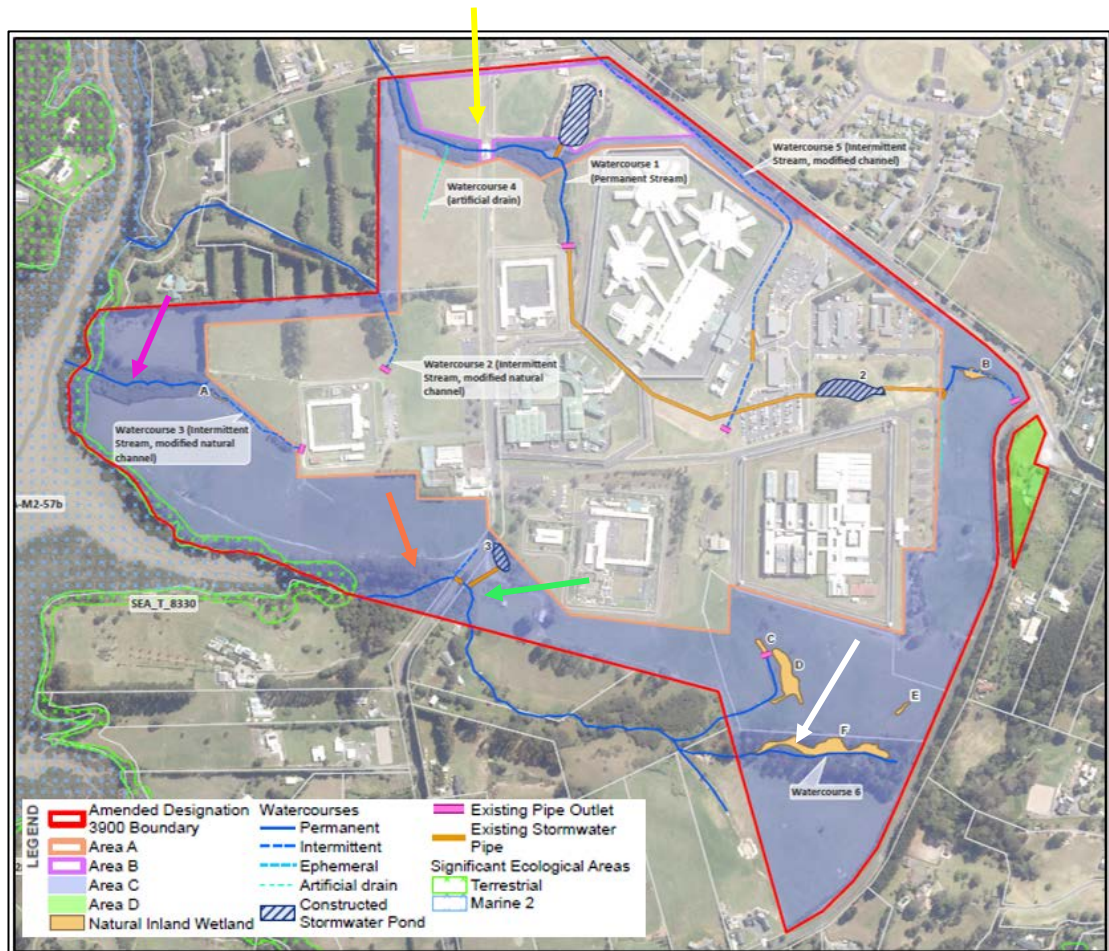


Figure 22. Ecology map showing the watercourse locations in the Site with the coloured arrows indicating the locations of streams included in the survey (source: Boffa Miskell)

Area 1

45. Area 1 was separated into three paddocks, accessed from the northeast corner of Area 2 northwards to Iona Avenue (Figure 23) and was in use for grazing cattle. The first paddock was relatively flat at the southern end, sloping down towards the north. There were no visible archaeological features, and probing did not detect any subsurface material. The central paddock was reasonably flat in grass and bisected by a permanent stream (indicated by yellow arrow in Figure 22), c.5m wide at the top and running towards the northeast into the northernmost paddock bordering Iona Avenue (Figure 24). The paddocks consisted of hard compacted topsoil and clay. Probing did not detect any archaeological features. A test pit (TP4) measuring 20cm x 20cm was dug to the west of the artificial drain. The topsoil was very compact, having a depth of 7cm, overlying a 6cm layer of silty light brown loam, which in turn overlay an orange-grey clay (Figure 25). No archaeological material was present
46. Vegetation was present along the northern boundary of the central paddock with post and wire fencing. For approximately 30m on the northern side, there was an area generally fenced off from cattle on both sides, with the artificial drain passing through from Sanders Road westwards before turning towards the northwest and passing

beneath Iona Avenue. The paddock was in grass and used for grazing. No archaeological features were identified in this area.



Figure 23. Panorama image looking northeast with Sanders Road right to centre of image. Image taken from southern end entrance from Area 2



Figure 24. Looking north over the central paddock in Area 1 showing the open drainage channel (arrowed red) and approximate location of TP4 (yellow dot)



Figure 25. Photograph showing the detail of test pit 4 (TP4) in Area 1

Area 2

47. Area 2 was the first area to be surveyed, as it was thought this area had the highest chance of archaeological sites being present due to waterway access and known presence of sites elsewhere along the Paremoremo Creek. The southeasternmost corner of Area 2 was bisected by a closed portion of Sanders Road (Figure 26). A permanent stream (indicated by green arrow in Figure 22) runs through this area (leading to an inlet of Paremoremo Creek) and the banks are bush clad. No archaeological features were identified in the southeastern corner.
48. The main part of Area 2 was divided into paddocks. The area was entered via a farm track off the closed portion of Sanders Road. The track leading into the area is cut below the surface, exposing the stratigraphy on the northern side of the track cut (Figure 27). The stratigraphy consisted of 20-30cm of light grey topsoil overlying light yellow-orange clay. The variability in topsoil depths is likely due to previous ploughing. The first paddock lies between the track and a workshop area, having a moderately steep slope. The adjoining paddock was also moderately sloped before opening on to a relatively flattish area at the top (Figure 28). Part of this area overlooks a prison unit and was not photographed. Both paddocks are in grass but had been grazed in the recent past. No visible archaeological features were noted, and probing did not detect any subsurface remains.
49. There is an esplanade area with large pines on a flattish terrace-like area in the southeastern part of area 2 leading down to a permanent stream (indicated by orange arrow in Figure 22). The terrace extended around 10-35m from the fenceline towards the stream. The vegetation along the stream banks was variable, with pine trees particularly on the terrace near the fence line with some gorse present. Vegetation near the stream consisted of ferns, ponga and karamu (Figure 29). There was a small patch of ginger on the southern end of Area 2. The southwestern end of the pine trees appeared to have been intentionally planted, as there were clearly two rows of trees, extending east to west running parallel to the fenceline. The terrace had a slight slope towards the stream, with a steeper slope roughly a metre wide before meeting a second narrow terrace/platform, from which there was a steep drop between 0.5m-1.5m drop to the stream. The southeastern end of the stream had a rock waterfall.
50. A test pit (TP1) was inserted on a slightly sloping terrace c.35m from the fenceline and c.15m from the stream within an area with a light grass cover. The stratigraphy of the test pit showed 5cm of brown moderate to firm topsoil, over 12cm of light greyish-brown mottled clay with occasional dark brown and orange clay inclusions of mixed particle size, overlying yellow clay of firm compaction with some orange clay inclusions (Figure 30).
51. A flattish terrace-like area containing gum trees and pines on the south side of the fenceline was inspected; however, probing did not detect any shell. A terrace near the base of the slope measured c.0.55m with a length of c.30m. This is likely the result of a slump.
52. The third paddock has had trees at the highest point removed in the past. There was a knoll by a flat area adjacent to a prison unit, with a steep slope to the rest of the paddock.

The area was in grass of medium length. There was a somewhat undulating landscape leading into a fourth paddock. The area to the right of the farm track had been cultivated in the past. From the fenceline to an inlet of Paremoremo Creek was more grassland, c.15-20m in width with ti-tree, gorse and more recent plantings. Dense ferns were located closer to the creek edge. Some erosion of the banks allowed for inspection (Figure 31); however no archaeological material was identified. Mangroves were present in the creek inlet where there has been some silt build-up.

53. The fourth paddock was in grass, undulating from the steeper part of the previous paddock near the prison unit down towards Paremoremo Creek. Pine was present along the top of the bank, and the presence of a previous landfill precluded close inspection of this area.
54. The fifth paddock was a large open area with some undulation. This paddock was previously heavily disturbed during the installation of a major gas pipeline. The paddock is bounded by a stream (indicated by pink arrow in Figure 22) to the south and by Paremoremo Creek to the west. Midden site R10/831 was believed to be present along this section of Paremoremo Creek, and the focus of the survey was within the area bordering the creek. There was generally bush all along the creek with some pine present. A flattish area near the juncture of the stream and Paremoremo Creek was probed but no shell was located. A second low terrace further north was located which better matched the description provided in the SRF (Figure 32, left). The area was unfortunately covered with a lot of modern rubbish. Probing, however, detected shell in this location. A test pit (TP2) was inserted locating shell at a depth of 12cm (Figure 32, right). Shell observed included cockle with some horn shell present which was highly fragmented. This site was identified as likely site R10/831. Macrocarpa trees were present above the terrace with fern at the back of the terrace, whilst in front of the terrace were mahoe and totara, with young plants by the fenceline.
55. Further along the creek bank there was a cleared area with a few trees, sloping towards the creek before dropping c.60cm to the creek. A stream was noted to continue to the north, bordered by relatively open old growth manuka on both sides. A culvert with a land bridge over the top was present (Figure 33). The stream appears to originate to the east, passing through the field from the southwest corner of the prison unit. The open grassed area between the farm bridge and the prison unit did not show any archaeological features.
56. The area on the northern side of the stream was largely old growth manuka but was situated on a large flattish area above the slope to the stream (Figure 34). The area was c.15m wide x c.40m long and was potentially a location that might have been inhabited for a short time. Probing around the area did not locate any subsurface shell material. A test pit (TP3) was inserted in this area. Measuring 25cm x 25cm x 11cm deep, the grey topsoil was very dry and very firmly compacted and overlay a clay loam (Figure 35).
57. To the north of the old growth manuka was an open grass paddock with a steep slope on the northern side. There was a raised area which could potentially be described as a manmade terrace around a knoll on the western end. There was a lot of gorse on the southern and western sides of this area. Over the fenceline alongside the creek was a

flattish area largely in pine before dropping fairly steeply into the Paremoremo Creek. Probing in these areas detected no archaeological material. Further inspection of the potential terrace-like area did not indicate whether the modifications were likely to be the result of Māori occupation or much later modifications to the grounds through farming, although the latter is considered more likely. There was a large flattish area above the terracing (Figure 36); however, probing did not detect any archaeological features or material. The ground was, however, particularly compact. To the east of the flattish area the paddock undulates (Figure 37), leading to another paddock to the northwest of the prison unit. This paddock was almost completely flat with no visible archaeological features (Figure 38). Probing did not detect any subsurface features or material. The final paddock was also flat; however, it had been heavily disturbed in the past during the installation of the gas pipeline (Figure 39). This paddock has a track in the northeast corner that passes into Area 1 (Figure 40).



Figure 26. Photograph taken looking northeast along closed portion of Sanders Road showing bush on either side



Figure 27. Stitched image showing the exposed stratigraphy in the farm track cut in Area 2



Figure 28. Photograph taken in Area 2 looking east over paddocks on southern side of workshop and prison unit with farm track to base of slope on right



Figure 29. Photograph showing punga and ferns at base of slope above the stream in Area 2



Figure 30. Photograph showing the detail of test pit 1 (TP1) in Area 2 located on the slope between the stream and the fenceline



Figure 31. Photograph showing exposed section of eroded creek bank in Area 2



Figure 32. Left photograph showing location of test pit (TP2) on terrace in Area 2 and right showing the detail of the test pit



Figure 33. Photograph showing the land bridge over the top of a culvert in Area 2



Figure 34. Photograph showing the terrace on the north side of the narrow culverted stream in Area 2, under old growth manuka



Figure 35. Photograph showing detail of test pit (TP3) in Area 2, showing the hard compacted topsoil



Figure 36. Panorama of flattish area above possible terrace area in Area 2



Figure 37. Photograph looking east from flattish area in Area 2, showing undulation



Figure 38. Photograph showing paddock northwest of prison wall in Area 2



Figure 39. Photograph showing view from the east across the northern part of paddock adjacent to the prison unit in Area 2



Figure 40. Photograph showing farm track leading from northeast corner of Area 2 into southwest corner of Area 1

Area 3

58. Area 3 was located on the southeastern edge of the survey area, accessed from Merewhira Road and had a permanent stream (indicated by white arrow in Figure 22) in the northern part at a lower elevation. Area 3 was separated into two main paddocks with a post and wire fence, resulting in an east and a west paddock. Cows and young cattle were grazing in the area at the time of survey; however, they did not impede the survey. The property was accessed via a gate on Merewhira Road and there was a telecommunication tower in the southeast corner of the westernmost paddock (Figure 41). The paddocks were generally flattish at the southern end before sloping fairly steeply towards the stream at the northern end. There was no terracing, and the slope would not have been attractive for settlement (Figure 42). Probing did not detect any subsurface archaeological remains in either paddock.
59. At the lowest elevation, at the northern end of the area, was a flattish area under pines bisected by the stream passing through a culvert beneath Merewhira Road (Figure 43). The areas alongside the stream on both sides were generally in pine, but other species such as gum, cabbage tree (on the northern side), and native shrubs were present. The northern side was reached by a track leading over the stream on the eastern side (Figure 44). The terrace-like area was probed, tree bases and exposed soils were inspected; however, no shell material was located (Figure 45, left). A test pit (TP5) was inserted in the larger terrace area on the southern side of the stream. Measuring 15cm x 15cm, the silty dark grey topsoil was moderately compacted, reaching a depth of 4cm where it overlay a light grey interface of 2cm thickness, in turn overlying hard natural grey clay (Figure 45, right). There were no indications of archaeological remains in Area 3.
60. It is noted that no archaeological remains apart from the previously recorded archaeological site were identified during the survey, however, as the stream banks (locations where shell midden sites are often located) tended to be heavily vegetated and steep in some cases, the possibility that archaeological sites, such as shell midden that were not able to be detected during the surveys cannot be completely excluded.



Figure 41. Looking northeast across the upper portion of Area 3 showing the telecommunication tower at the edge of the westernmost paddock



Figure 42. Looking up the slope towards Merewhira Road in the easternmost paddock of Area 3



Figure 43. Panorama of part of the lower elevation on the southern side of the creek in Area 3 showing flattish areas and stream passing (right to centre left)



Figure 44. Photograph showing the track leading over the creek in Area 3 to the northern side



Figure 45. Left photograph showing the location of test pit 5 (TP5) on the flattish area on the southern side of the stream in Area 3 – yellow dot; and right photograph showing the detail of the test pit

Area 4

61. This area covers the property at 505 Paremoro Road. The property is accessed from Paremoro Road and there is a large, gravelled parking area in front of an existing community hall building with water tanks (photographs in Figure 46 and Figure 47). There is also a grassed paddock in the northwestern part of the property, although part of this paddock has undergone recent land disturbance for installation of disposal fields (Figure 48). The southern part of the property consists of a treelined grassed area. Three test pits were undertaken during the survey two in the south and one in the northwestern paddock with the locations are shown in Figure 49.
62. The southern area was found to consist of gently undulating land with an overland flow path between the property and Merewhira Road. The flow path turns into the property and runs across it in the south. Probing did not indicate the presence of any subsurface archaeological deposits. Test pit (TP6) was located to the south of the community hall building. The test measured 20cm x 20cm and consisted of a dark yellowish brown silt topsoil to a depth of 5cm over a slightly clayey yellowish brown silt to a depth of 15cm where a mottled yellow-grey natural clay was encountered (photographs in Figure 50 and Figure 51). A second test pit (TP7) was located at the southern end of the property on a gentle slope running up to Merewhira Road. This test pit also measured 20cm x 20cm. This test pit showed a yellowish brown silt topsoil to a depth of 10cm which overlay a mottled yellow/ orange and grey clay (photographs are shown in Figure 52 and Figure 53).
63. The part of the paddock in the northwest of the property that had not been affected by the recent disposal field works was probed and it was found to contain a hard layer between 5cm and 20cm below the ground surface. A test pit (TP8) was located in this area to identify the nature of the hard layer. The test pit showed a grey-brown silt turf with grass roots to a depth of 5cm over a grey-brown silt with pieces of gravel visible to a depth of 18cm, where a layer of larger stones/ aggregate was identified (photographs are shown in Figure 54 and Figure 55).
64. No archaeological features or deposits were identified in Area 4.



Figure 46. Photograph showing the community hall at 505 Paremoro Road, looking south



Figure 47. Photograph showing the water tank beside the community hall, looking northwest



Figure 48. Photograph showing the area where disposal field works have occurred, looking northwest



Figure 49. Aerial plan showing the locations of the test pits at 505 Paremoremo Road (source: Auckland Council GeoMaps)



Figure 50. Photograph showing the southern paddock with the location of test pit (TP6) indicated by red arrow, looking south



Figure 51. Photograph showing the detail of test pit (TP6)



Figure 52. Photograph of the southern paddock showing the location of test pit (TP7) indicated by red arrow



Figure 53. Photograph showing the detail of test pit (TP7)



Figure 54. Photograph of the paddock in the northwest of the property with location of test pit (TP8) indicated by red arrow, looking northwest



Figure 55. Photograph showing the detail of test pit (TP8)

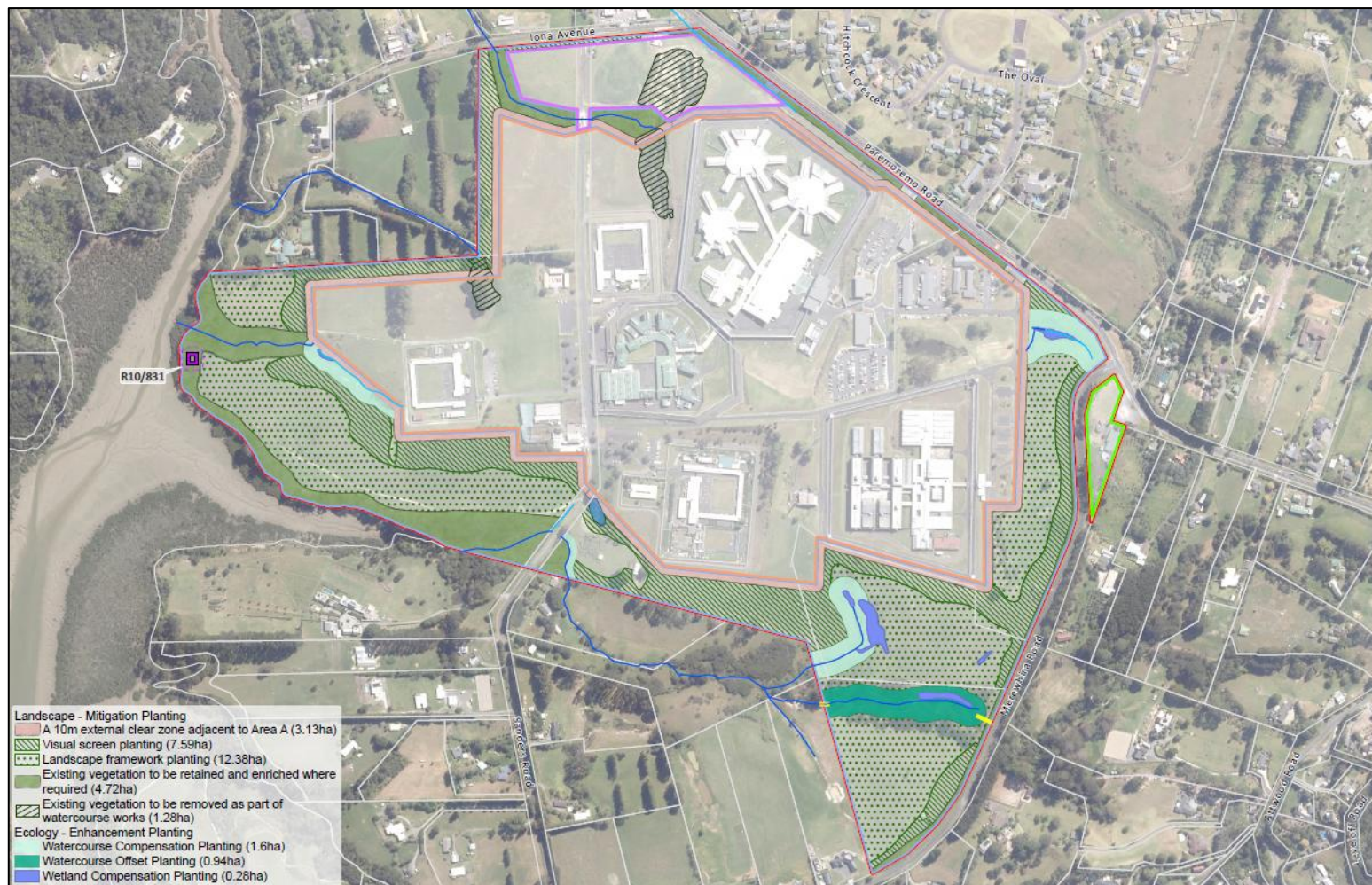


Figure 56. Landscape Mitigation and Ecology Enhancement Plan (LMEEP) with archaeological site R10/831 identified and with buffer zone indicated by orange square (source: Boffa Miskell)

7 DISCUSSION AND CONCLUSIONS

14 Summary of Results

65. One archaeological site had been previously recorded in the Site. This is R10/831 (terrace/ midden) which is located on the banks of Paremoremo Creek along the western boundary. Although no additional sites were identified during any of the surveys for the current or previous assessments in 2013, 2014 and 2025, it is considered that the area bordering Paremoremo Creek and also along streams have the potential to contain additional sites associated with Māori occupation and settlement in the form of shell midden. This is based on the nature and location of sites recorded in the vicinity. The remainder of the Site is considered to have low potential for containing archaeological sites based on the topography and evidence of past modifications from prison construction and agriculture. Based on the research presented in this assessment, pre-1900 European activities appear to be mainly associated with timber felling and possibly gum digging. There is no evidence of a homestead prior to 1900 and the potential for encountering archaeological sites associated with early European settlement are considered low.

15 Māori Cultural Values

66. This is an assessment of archaeological values and does not include an assessment of effects on Māori cultural values. Such assessments should only be made by the tangata whenua. Māori cultural concerns may encompass a wider range of values than those associated with archaeological sites, and consultation with Māori and Iwi groups has occurred as described in the Māori Consultation and Cultural Values assessment report provided in Volume 1, Appendix 1F to the Substantive Application
67. The historical association of the general area with the tangata whenua is evident from the recorded sites, traditional histories and known Māori place names.

16 Survey Limitations

68. It should be noted that archaeological survey techniques (based on visual inspection and minor sub-surface testing) cannot necessarily identify all sub-surface archaeological features or detect wāhi tapu and other sites of traditional significance to Māori, especially where these have no physical remains.

17 Archaeological Value and Significance

69. The Auckland Regional Policy Statement (RPS) B5.2.2 (Policies Identification and Evaluation of Historic Heritage Places) identifies several criteria for evaluating the significance of historic heritage places. In addition, Heritage NZ, has provided guidelines setting out criteria that are specific to archaeological sites (condition, rarity, contextual value, information potential, amenity value and cultural associations) (Heritage NZ 2019: 9-10). Both sets of criteria have been used to assess the value and

significance of the archaeological site R10/831 (terrace/ midden) in Table 3 and Table 4.

70. The archaeological value of sites relates mainly to their information potential, that is, the extent to which they can provide evidence relating to local, regional and national history using archaeological investigation techniques, and the research questions to which the site could contribute. The surviving extent, complexity and condition of sites are the main factors in their ability to provide information through archaeological investigation. For example, generally pā are more complex sites and have higher information potential than small midden (unless of early date). Archaeological value also includes contextual (heritage landscape) value. Archaeological sites may also have other historic heritage values including historical, architectural, technological, cultural, aesthetic, scientific, social, spiritual and traditional values.
71. Overall, site R10/831 is considered to have limited to moderate archaeological value based on the criteria discussed, with the moderate value arising from knowledge potential, as it is likely to contain material suitable for radiocarbon dating and environmental analysis which can provide information on local resource procurement and dates of occupation.

Table 3. Assessment of the archaeological values of site R10/831 (terrace/ midden) based on Heritage NZ criteria (Heritage NZ 2019: 9-10)

Value	Assessment
Condition	The midden appears to have been damaged by modern activities (modern rubbish was present).
Rarity	Shell midden sites are common both locally and regionally.
Contextual value	The site is one of a collection of sites relating to wider Māori settlement along Paremoremo Creek. Other sites in the wider archaeological landscape consist of pits, midden, terraces and pā. The site therefore represents one element in an extensive archaeological landscape.
Information potential	The site has moderate potential to provide information relating to Māori settlement in the area through environmental analysis and radiocarbon dating.
Amenity value	The site has no amenity value as it is located on Crown-owned land with no public access and is subsurface, which means it is not able to be viewed and appreciated by an observer. As well, as the public cannot access the site it cannot contribute to the perceived pleasantness or attractiveness or contribute to defining the heritage character of the area.
Cultural associations	The cultural significance of the site is for tangata whenua to determine.
Other	No other values have been identified.

Table 4. Assessment of the historic heritage significance of site R10/831 (terrace/ midden) based on the criteria in the AUP OP (Chapter B5.2.2)

Criterion	Comment	Significance Evaluation
a) historical: The place reflects important or representative aspects of national, regional or local history, or is associated with an important event, person, group of people or idea or early period of settlement within New Zealand, the region or locality	The date of the site is not known but based on the presence of the surrounding archaeological sites it is likely to be prior to contact with Europeans. It is not known to be associated with any important historical events or people.	Limited
b) social: The place has a strong or special association with, or is held in high esteem by, a community or cultural group for its symbolic, spiritual, commemorative, traditional or other cultural value	There are no known community or cultural associations.	None
c) Mana Whenua: The place has a strong or special association with, or is held in high esteem by, Mana Whenua for its symbolic, spiritual, commemorative, traditional or other cultural value	To be determined by mana whenua.	Not assessed
d) knowledge: The place has potential to provide knowledge through scientific or scholarly study or to contribute to an understanding of the cultural or natural history of New Zealand, the region, or locality	There is potential for material suitable for radiocarbon dating and potentially artefacts to provide new information relating to resource procurement and date of occupation though scientific analyses.	Moderate
e) technology: The place demonstrates technical accomplishment, innovation or achievement in its structure, construction, components or use of materials	The site does not contain any structural elements.	None
f) physical attributes: The place is a notable or representative example of a type, design or style, method of construction, craftsmanship or use of materials or the work of a notable	The site does not contain any notable features.	None

Criterion	Comment	Significance Evaluation
architect, designer, engineer or builder;		
g) aesthetic: The place is notable or distinctive for its aesthetic, visual, or landmark qualities	No notable or distinctive features are known.	None
h) context: The place contributes to or is associated with a wider historical or cultural context, streetscape, townscape, landscape or setting	The site is one of the many sites associated with Māori occupation and settlement along Paremoremo Creek. Other sites in the wider archaeological landscape consist of pits, midden, terraces and pā. The site therefore represents one element in an extensive archaeological landscape	Little to Moderate

18 Effects of the Proposal

72. The layout for the future facilities within Area A and Area B is not available, however, the earthworks requirements based on the likely depth of future excavations to create building platforms have been estimated and are described below.
73. The depth of excavation in Area A, is estimated to be between 1-2m for the construction of build platforms. It is noted that some parts of this area have already been modified, and the presence of in-situ archaeological remains being encountered during the works is considered low.
74. The depth of excavation in Area B is estimated to be between .75 to 1.25m which will be required for the construction of the new carpark and establishment of pavements and also for the construction of localised control buildings. The eastern part of Area B has undergone extensive earthworks in the past and archaeological remains would have been destroyed by these works. The western part of Area B has been affected by previous agricultural activities and the presence of archaeological remains being encountered during the works is considered low, however, this cannot be completely excluded.
75. Works within Area C are expected to largely comprise of planting as shown in the LMEEP in Figure 56 (with some localised earthworks in areas for infrastructure including stormwater facilities, plus potentially earthworks associated with the construction of facilities in Areas A and B) as explained in Table 1. These activities have the potential to affect any archaeological remains that may have survived. It is noted that the nature of these works should allow for avoidance of sites, which would

be most likely along the edges of Paremoremo Creek and also along streams, where possible.

76. Works in Area D will consist of potential redevelopment of community facilities and the depths of excavation are estimated to be between .75 to 1.25m. The presence of archaeological remains to be present in Area D is considered to be low, however, the possibility cannot be completely excluded.
77. The LMEEP plan in Figure 56 shows the areas of proposed planting in the vicinity of waterways that have not undergone major modification in the past.
78. The proposed works will not affect the recorded archaeological site R10/831 (shell midden) which is located along the banks of Paremoremo Creek in Area C. The archaeological feature is located within the area of “Existing Indigenous vegetation and native planting (to be retained and augmented where required)” in the proposed LMEEP, contained in Figure 56, therefore future planting in this area is not expected to be extensive. For protection, the location of site R10/831 as is identified on the LMEEP and is supported with a 10 metre setback from the feature to ensure future activities do not disturb or modify the identified feature.
79. In any area where archaeological sites have been recorded in the general vicinity of a proposed development, it is also possible that additional subsurface archaeological remains may be exposed during future development. Based on current information and the findings of this assessment the types of sites that may be encountered during development would most likely be shell midden in the vicinity of Paremoremo Creek or possibly along streams and would have a similar (low-moderate) archaeological value to site R10/831.
80. The land along the border of Paremoremo Creek is identified as “existing indigenous vegetation and native planting (to be retained and augmented where required) in the LMEEP, meaning disturbance in the areas bordering the coast with highest potential for unrecorded archaeological features is expected to be minimal and the planting works should avoid any archaeological sites encountered.
81. Overall, effects on archaeological values from the proposed enabling works and planting are considered to be minor as there are no recorded archaeological sites within the Site except for midden site R10/831 which has limited -moderate archaeological value and will be avoided. As well, any unidentified sites of a similar nature that may be present are likely to be located along Paremoremo Creek and streams which are located some distance from the areas of the Site where new prison facilities will be located.
82. As no recorded archaeological sites will be affected, an Authority will not be required for the proposed development. However, as the possibility that unrecorded archaeological sites cannot be completely excluded, an Authority to cover the proposed enabling works and planting, is being sought by Corrections as a precaution for risk management purposes. The conditions of the Authority will include archaeological monitoring of preliminary earthworks/ and or planting, and procedures for recording any archaeological evidence before it is modified or destroyed. This approach has the

advantage of allowing any archaeology uncovered during the development of the site to be dealt with immediately, avoiding delays that would otherwise occur if an Authority was not applied for in advance of preliminary earthworks.

83. The plan in Figure 57 shows the areas where archaeological monitoring is recommended during planting works in the vicinity of streams and Paremoremo Creek, where archaeological sites, such as shell midden may be present and also in the parts of Area A and B which were not found to have undergone any major earthworks from the research undertaken for this assessment.

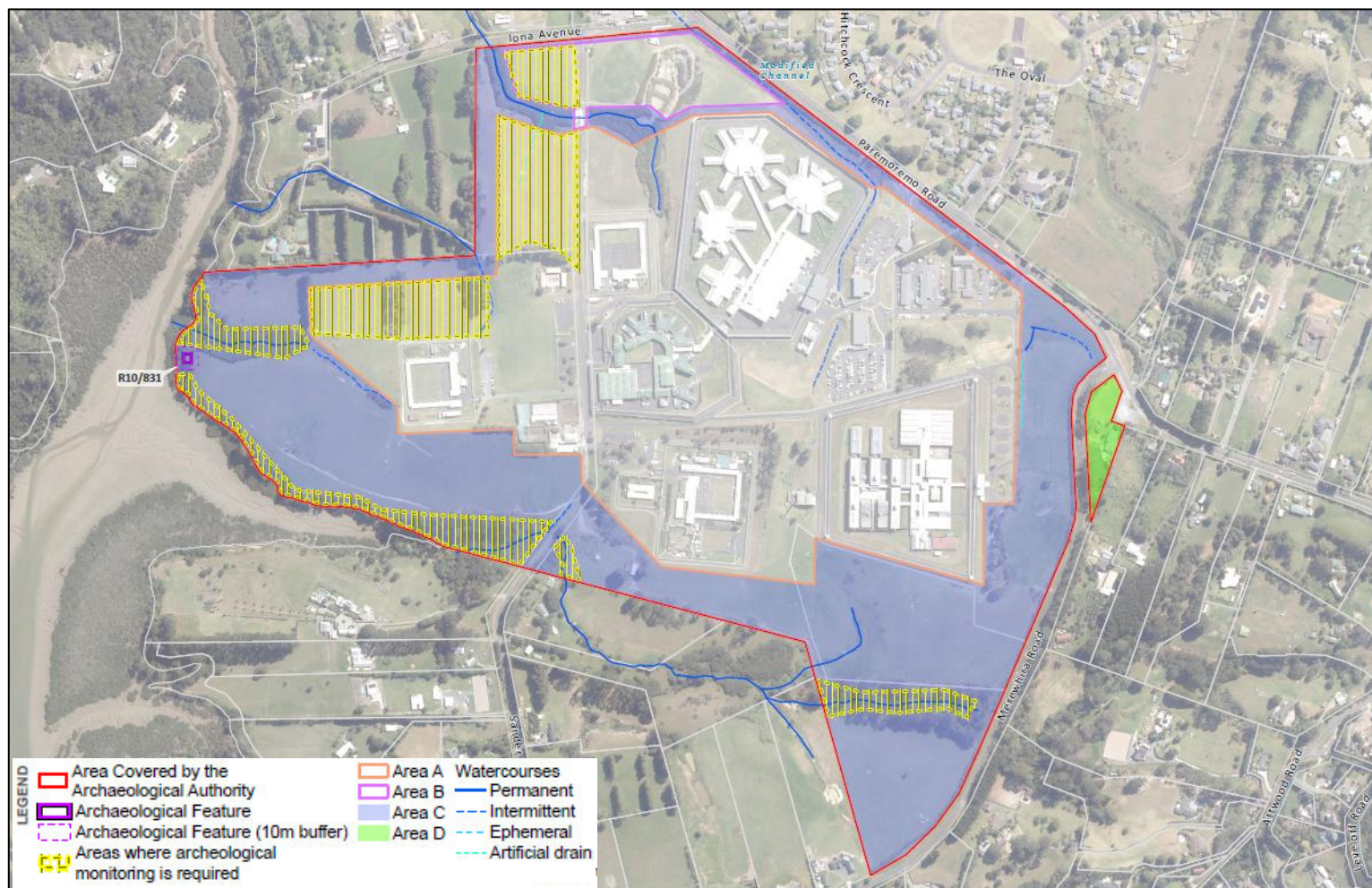


Figure 57. Site Plan with areas where planting works and preliminary earthworks should be monitored by an archaeologist indicated by yellow hatching (source: Boffa Miskell)

19 Fast-track Approvals Act 2024

84. Under the FTAA in Section 42(1), an authorised person for a listed project or a referred project may lodge an application with the EPA. Under section 42(3)(a) of the FTAA the applicant must be eligible to apply for any corresponding approval under a specified Act. A substantive application may seek under Section 42(4)(i) an archaeological authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT) that would otherwise be applied for under that Act- but as stated in section 42(9)(a) of the FTAA may be made only if the application also seeks an approval described in section 42(4)(a) or (d); it may also include an application under clause 7 of Schedule 8 application for approval of person to carry out activity subsection 9 (b).
85. Clause 4(1) of Schedule 8, of the FTAA states that the Panel, when considering an application for an archaeological authority, must take into account the following matters, and giving the greatest weight to (a):
- (a) The purpose of the FTAA; and
 - (b) The matters set out in section 59(1)(a) and (5) of the HNZPT Act; and
 - (c) The matters set out in section 47(1)(a)(ii) and 5 of the HNZPT Act; and
 - (d) A relevant statement of the general policy confirmed or adopted under the HNZPT Act.
86. Clause 9 of Schedule 8 of the FTAA states that an authority granted under the FTAA-
- (a) Has the same force and effect as it were granted under section 48 of the HNZPT Act; and
 - (b) For the purposes of the HNZPT Act, must be treated as if it were an authority granted under that Act.

This report has acknowledged the considerations that the Panel will take into account as set out in clause 4 of Schedule 8 of the FTAA as follows;

87. the purpose of the Act which is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits;
88. section 59 (1) of the HNZPTA decision on appeal states that in determining an appeal made under section 58, the Environment Court-
- (a) must, in respect of a decision made on an application made under section 44, have regard to any matter it considers appropriate, including—
 - (i) the historical and cultural heritage value of the archaeological site and any other factors justifying the protection of the site:
 - (ii) the purpose and principles of this Act:
 - (iii) the extent to which protection of the archaeological site prevents or restricts the existing or reasonable future use of the site for any lawful purpose:

- (iv) the interests of any person directly affected by the decision of Heritage New Zealand Pouhere Taonga;
- (v) a statutory acknowledgement that relates to the archaeological site or sites concerned;
- (vi) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga; and

(b) may confirm or reverse the decision appealed against or modify the decision in the manner that the Environment Court thinks fit.

89. section 47 (1) (a) (ii) which states that in the case of an application for an authority made under section 44 (b), where the effects of the proposed activity are, or are likely to be, no more than minor, assessed in accordance with subsection (5)

90. As the potential for archaeological remains cannot be completely excluded an Authority to cover works associated with future uses contained in Table 1 is being sought by Corrections under the FTAA for risk management purposes as a precaution, although no known sites will be affected and it is unlikely that any undetected sites are present.

91. An archaeological Authority granted under the FTAA has the same force and effect as an Authority granted under the Heritage New Zealand Pouhere Taonga Act 2014 and for purposes of the HNZPTA, must be treated as if it were an authority under that Act (Schedule 7 Section 12A (a) and (b)).

20 Heritage New Zealand Pouhere Taonga Act 2014

92. In addition to any requirements under the RMA, the HNZPTA protects all archaeological sites whether recorded or not, and they may not be damaged or destroyed unless an Authority to modify an archaeological site has been issued by Heritage NZ (Section 42).

93. An archaeological site is defined by the HNZPTA Section 6 as follows:

‘**archaeological site** means, subject to section 42(3), –

(a) any place in New Zealand, including any building or structure (or part of a building or structure) that –

(i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and

(ii) provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and

(b) includes a site for which a declaration is made under section 43(1)²

94. Authorities to modify archaeological sites can be applied for either in respect to archaeological sites within a specified area of land (Section 44(a)), or to modify a specific archaeological site where the effects will be no more than minor (Section 44(b)), or for the purpose of conducting a scientific investigation (Section 44(c)). Applications that relate to sites of Māori interest require consultation with (and in the case of scientific investigations the consent of) the appropriate iwi or hapu and are subject to the recommendations of the Māori Heritage Council of Heritage NZ. In addition, an application may be made to carry out an exploratory investigation of any site or locality under Section 56, to confirm the presence, extent and nature of a site or suspected site.
95. Consultation with Heritage NZ has occurred and is described in Volume 1, Appendix 1G to the Substantive Application.

21 Conclusions

96. One archaeological site, R10/831 (midden) has been identified along Paremoro Creek which makes up the western boundary of the Site. R10/831 was previously recorded in the Auckland Council CHI in an inaccurate location which was to the south of the Site. However, the information in the NZAA site record and the survey for this assessment have confirmed that the location of R10/831 is along the western boundary of the Auckland Prison site.
97. The recorded archaeological site R10/831 will be avoided during the proposed enabling works and planting. There is, however, some potential for additional unidentified subsurface remains associated with Māori occupation and settlement to be present. However, the main area of archaeological interest is along and in proximity to Paremoro Creek and streams in Area C, some distance from the proposed development areas A and B and the proposed works in Area C consists of revegetation planting, which should avoid any archaeological sites if encountered.
98. Based on the past modifications to the Site from earthworks associated with the construction of prison facilities and agricultural activities, along with the limited-moderate archaeological value of the identified archaeological site within the Auckland prison site, any effects on archaeological values from the proposed enabling works and planting are considered likely to be minor. As well, if any additional sites are present, they are likely to be of a similar nature and archaeological value to site R10/831 which is limited-moderate value for reasons expressed above.

Under Section 42(3) an Authority is not required to permit work on a pre-1900 building unless the building is to be demolished. Under Section 43(1) a place post-dating 1900 (including the site of a wreck that occurred after 1900) that could provide 'significant evidence relating to the historical and cultural heritage of New Zealand' can be declared by Heritage NZ to be an archaeological site.

99. Corrections is seeking an Archaeological Authority, for risk management purposes, although an Authority is not required for the proposed earthworks and planting as the recorded archaeological site R10/831 will be avoided. Nevertheless, the presence for additional subsurface archaeological remains cannot be completely excluded, particularly in the vicinity of Paremoremo Creek and streams and possibly in the less modified parts of Area A and B. This approach has the advantage of allowing any archaeology uncovered during the development of the site to be dealt with immediately, avoiding delays that would otherwise occur if an Authority was not applied for in advance of preliminary earthworks.

22 Recommendations

100. There should be no constraints on the proposed development works as presented in Table 1 on archaeological grounds, as the recorded archaeological site, R10/831 will be avoided, and it is considered unlikely that any unrecorded sites will be exposed during development.
101. As the possibility of exposing subsurface remains cannot be completely excluded, particularly in the vicinity of Paremoremo Creek and streams and the less modified parts of Areas A and B, an Authority is being sought by Corrections, as a precaution to minimise delays if archaeological remains are exposed once works are underway.
102. Once an Authority is obtained, preliminary earthworks and planting in the areas highlighted in Figure 56 should be monitored by an archaeologist, in accordance with the Archaeological Management Plan, in case any archaeological remains are present. In other areas earthworks and planting can occur without archaeological supervision.

8 BIBLIOGRAPHY

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- Bickler, S. and R. Clough. 2014. Auckland Prison, Paremoremo: Archaeological Assessment. Clough & Associates report prepared for Fletcher Construction Company Limited.
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APPENDIX A: SITE RECORD FORM R10/831

NEW ZEALAND ARCHEOLOGICAL ASSOCIATION INCORPORATED

		<h1>Site Record Form</h1>	
NZAA Site Number:	R10/831	Site Coordinates (NZTM)	
Imperial Site Number:		Easting:	1745946
Site Type:	Midden/Oven	Northing:	5930775
Site Name(s):		Source:	CINZAS



Scale: 1:2,500 Disclaimer: Polygon may not reflect the full extent of the site

<p>Finding Aids to the Location of the Site: Situating within the coastal fringe, within the dense vegetation, within large tree roots</p>
<p>Brief Description: Terrace in bank of creek, shell midden eroding from creek edge</p>
<p>Condition of Site when last visited: No Recent Info</p>

Printed by: CLOU_EllenCameron_ArchSite

Date Report Created: 20/04/2025

NEW ZEALAND ARCHEOLOGICAL ASSOCIATION INCORPORATED

Site Periods:

Indigenous pre-1769

Ethnicity:

Maori

Site Features:

Terrace, Midden

Associated Sites:

Description:

Updated 13/03/2025 (Field Visit), submitted by: CLOU_GlenFarley_ArchSite, visited 20/02/2025 by Jen Low; Kirstin Roth

Roughly a 2m midden, situated within the coastal fringe, within the dense vegetation. Significant disturbance by trees, and large amount of modern rubbish.

Condition Notes:

Date Report Created: 20/04/2025

New Zealand Archaeological Association SITE RECORD FORM (NZMS 260)		NZAA METRIC SITE NUMBER: R10/ 831	
NZMS 260 map number: R10 NZMS 260 map name: WHANGAPARAOA NZMS 260 map edition: 1		DATE VISITED: 25 JANUARY 1996 SITE TYPE: TERRACE/MIDDEN SITE NAME: MAORI OTHER	
<i>Grid References</i>		Easting: 2656450	Northing: 6492200
1. Aids to relocation of site (<i>attach a sketch map</i>): Proceed down Sanders Road to the low security wing of prison. Turn left (behind maintenance workshops) into paddock and continue on down to Paremoremo Creek, site is situated in reserve strip on west facing bank of creek. Terrace cutting is quite visible.			
2. State of site and possible future damage: Good condition not likely to suffer future damage			
3. Description of site (<i>Supply full details, history, local environment, references, sketches, etc. If extra sheets attached include a summary here</i>): A west facing terrace approximately 2.5m above the creek along bank. Terrace measures 10m long x 5m wide and has been cut into bank. Probing and test pit revealed shell midden - crushed cockle and piece of red ochre.			
4. Owner: Justice Department Address: Auckland Prison		Tenant/Manager: Ken Marchant Address: Auckland Prison	
5. Nature of information (<i>hearsay, brief or extended visit, etc.</i>): survey visit Photographs (<i>reference numbers, and where they are held</i>): Aerial photographs (<i>reference numbers, and clarity of site</i>): SN 8772 G/10			
6. Reported by: Jeff Mosen (Bioreserches) Address: Box 2828, Auckland 1		Filekeeper: Date:	
7. Key words: TERRACE; SHELL MIDDEN; AUCKLAND PRISON; PAREMOREMO CREEK			
8. New Zealand Register of Archaeological Sites (<i>for office use</i>) NZHPT Site Field Code			
Latitude S <input type="checkbox"/> Type of site <input type="checkbox"/> Local environment today <input type="checkbox"/> Land classification		Longitude E <input type="checkbox"/> Present condition and future danger of destruction <input type="checkbox"/> Security code <input type="checkbox"/> Local body	
New Zealand Archaeological Association SITE RECORD FORM (NZMS 260) ADDITIONAL INFORMATION SHEET			



APPENDIX B: ACCIDENTAL DISCOVERY PROTOCOL DESIGNATION CONDITIONS (DES22)

In the event of sensitive material being uncovered during the course of any land disturbance or other works within the Auckland Prison site, the requiring authority shall take the following steps:

(a) Cease works and secure the area

- (i) Immediately cease all works within 20m of any part of the discovery, including shutting down all earth disturbing machinery and stopping all earthmoving activities.
- (ii) Secure the area of the discovery, including a sufficient buffer area to ensure that all sensitive material remains undisturbed.

(b) Inform tangata whenua and the following relevant authorities immediately of the discovery

- (i) The New Zealand Police, if the discovery is of human remains or koiwi.
- (ii) Auckland Council, in all cases.
- (iii) Heritage New Zealand Pouhere Taonga, if the discovery is an archaeological site, Māori cultural artefact, human remains or koiwi.

(c) Wait for and enable an inspection of the site

- (i) Wait for and enable an inspection of the site by tangata whenua and the relevant authorities.
- (ii) The requiring authority shall arrange an inspection of the area by a suitably qualified and experienced archaeologist (“the archaeologist”).

103. Following the inspection by the archaeologist and consultation with all relevant parties (including the requiring authority), and based on the expert cultural advice of tangata whenua, the archaeologist shall will determine the area within which work must cease.

(d) Resumption of work

- (i) Work within the area determined by the archaeologist in (c)(iii) above must not recommence until all of the following requirements, so far as relevant to the discovery, have been met:
- (ii) Heritage New Zealand Pouhere Taonga has confirmed that an archaeological authority has been granted for the work or that none is required.

- (iii) Any required notification under the Protected Objects Act 1975 has been made to the Ministry for Culture and Heritage.
- (iv) Any material of scientific or educational importance must be recorded and if appropriate, recovered and preserved. The recovery or preservation of any archaeological material will require an authority under the Heritage New Zealand Pouhere Taonga Act 2014.
- (v) Any koiwi have either been retained where discovered or removed in accordance with the appropriate tikanga

Note: For the purpose of this condition, 'sensitive material' means:

- (a) Human remains and koiwi.
- (b) An archaeological site.
- (c) A Māori cultural artefact/taonga tuturu.
- (d) A protected New Zealand object as defined in the Protected Objects Act 1975 (including any fossil or sub-fossil).

APPENDIX C: STATEMENT OF EXPERIENCE

This report has been prepared by the following author who have the following qualifications and expertise:

Name	Qualification/ Experience
Ellen Cameron	Refer to attached CV

Code of conduct for expert witnesses

In the context of this application, which is made under the Fast-track Approvals Act 2024, and in relation to which there may be no hearing, we have been asked to confirm that the reporting has been prepared in accordance with the Environment Court’s Code of Conduct for Expert Witnesses.

We confirm that we have read the Environment Court’s Code of Conduct for Expert Witnesses, as contained in section 9 of the Environment Court’s Practice Note 2023, and we agree to comply with it.

The data, information, facts and assumptions that we have considered in forming our opinions are set out in our technical report. The reasons for the opinions expressed are also set out in the technical report.

We confirm that the matters addressed in the technical report are within our area of expertise, with the exception of where we confirm that I we are relying on information provided by another person. We have not omitted to consider material facts known to us that might alter or detract from our opinions expressed. We have specified where our opinion is based on limited or partial information, and we have identified any assumptions we have made in forming our opinions.

Designation conditions have been developed to ensure that:

- (a) the development parameters are reflected in the Designation purpose and conditions; and
- (b) the adverse environmental effects from the proposal to increase capacity are avoided, remedied or mitigated.

Ellen Cameron has inputted into the development of the conditions, and where noted in the assessment of effects below, these have formed the basis for certain conclusions.

As set out below, in some instances assumptions have been made in this report about the physical characteristics and operations for future facilities. These assumptions are based on the maximum anticipated envelope of effects that are reasonably anticipated, based on

current design and operational models. Where necessary, recommendations are made in respect to these assumptions in the proposed conditions.

The assumptions made include:

- That the development areas will be located in Area A and Area B;
- That it is unlikely that any unrecorded archaeological sites are located in Area A and Area B based on the past modifications in these areas;
- That the works proposed in the Amended Designation 3900 area outside of Area A and Area B in proximity to Paremoremo Creek will primarily consist of vegetation removal and planting;
- That the recorded site R10/831 will be avoided;
- That any unrecorded sites outside of Area A and Area B will be avoided if possible, or if not able to be avoided, effects will be mitigated under the provisions under Section 44(a) of the HNZPTA.

Ellen CAMERON

Name: Ellen CAMERON

Present Position: Co-Director Clough & Associates New Zealand

Nationality: Canada/ New Zealand

Profession: Archaeologist

Specialisation: Archaeological Assessment/ Monitoring

Qualifications: BA, Sociology and Anthropology, Carleton University, Ottawa, Canada 1987
MSc, Environmental Archaeology and Palaeoeconomy, University of Sheffield, UK, 1991

Professional Association Membership: NZAA; IPPA.

Years of Experience 27

Profile

Ellen is a qualified archaeologist and cultural resource manager with over twenty years' experience in Hong Kong and 11 years' experience in New Zealand, where she has been based since 2014. Ellen has worked on numerous archaeological projects including excavations and impact assessment projects both in Hong Kong and New Zealand. She is also involved in the development of mitigation strategies for protection from various types of construction and development activities. Ellen is currently working on commercial archaeological projects in New Zealand including planning studies, assessments and archaeological monitoring and investigation.

Recent Relevant Experience

Cameron, E and R. Clough. Waikeria Prison Expansion Enabling Works: Archaeological Assessment (2024). Project Archaeologist responsible for the assessment and authority application. Input included updating the 2017 archaeological assessment and providing information on statutory information and mitigation recommendations.

Cameron, E. Low Emissions Ferry Project: Archaeological Assessment for Auckland Transport (2023-present). Project archaeologist and manager for three project areas for installation of electrical charging stations for new electric ferries. The scope includes assessment of impacts and field survey and preparation of archaeological advice and management plans for the electrical installations.

Cameron, E. 20 Musick Point Road and 4 Clovelly Road Replacement of Transformer and Switch Removal: Archaeological Assessment prepared for Osbornehay Ltd (2022). Project archaeologist for the project. Background research for the project included details of heritage sites located on heritage schedules and on the Heritage NZ List/ Rārangī Kōrero and providing information on statutory requirements and mitigation recommendations.

Cameron, E. and D. Gaylard. Proposed Papatūia Solar Farm near Kaitiāia Northland: Archaeological Assessment for Ranui generation Ltd (2023). Project archaeologist and manager for the assessment of the site for a new solar farm, including identification of impacts and mitigation requirements and archaeological management plan.

Ellen CAMERON

Cameron, E. Downtown Carpark Redevelopment: Archaeological Assessment for Precinct properties (NZ) Ltd (2022- present). Archaeological assessment and development of strategies for investigation and recording of archaeological deposits, preparation of archaeological management plan.

Cameron, E. St Heliers, Undergrounding of Services and Installation of Street Lights: Archaeological Assessment prepared for Vector (2022-2023). Archaeological assessment and mitigation measures. Also included preparation of an archaeological management plan and monitoring programme.

Cameron, E. Ariki Tahī, Sugarloaf Wharf Expansion, Te Kouma, Coromandel: Archaeological Assessment. Project archaeologist for the project which included the preparation of assessment report and field survey, historical research for identification of archaeological remains associated with Māori occupation sites with management plan and monitoring programme was also included.

Cameron, E. Paerata Road Culvert Upgrade (Hickeys Recreation Reserve), Pukekohe: Heritage Impact Assessment for Tonkin & Taylor Ltd (2022). Project archaeologist for the project which included the preparation of assessment report and field survey, historical research for identification of archaeological remains associated with an historic flour mill. The preparation of a management plan and monitoring programme was also included.

Cameron, E. Cambridge Growth Cell C5, Leamington, Proposed Future Residential Development: Preliminary Archaeological Assessment prepared for Cogswell Surveyors Ltd (2021). Project archaeologist for the assessment and field survey of the growth cell. Identification of archaeological sites and preparation of mitigation measures.

Cameron, E. R. Clough and G. Farley. Kotare Park Proposed Residential Subdivision, Cambridge. Clough & Associates report prepared for Kotare Properties Ltd (2021). Project archaeologist for the assessment and field survey in a Māori horticultural landscape. The scope included identification of archaeological sites and areas of archaeological potential through field survey and preparation of a management plan and monitoring programme.

Cameron, E. Drury Town Centre assessment and archaeological monitoring for Kiwi Land Ltd (2017-present). Project archaeologist for all stages of the project from private plan change to archaeological monitoring during construction. This scope included preparing and presenting evidence for hearings based on assessments.

Cameron, E. and R. Clough. Prison Capacity Project Phase 2: Waikeria Prison, Waikato for Boffa Miskell (2017). Project Archaeologist for the assessment, including background research and field survey. The scope also included preparation of evidence for hearing in the Environmental Court.

Employment History

2014 to date	Senior Archaeologist (Co-Director from 2022) at Clough & Associates
1999 to 2014	Senior Archaeologist (Co-Director from 2005) at Archaeological Assessments Ltd Hong Kong
1992 to 1996	Freelance Archaeologist in Hong Kong

APPENDIX D: SITE PLAN FOR ARCHAEOLOGY

