

**ENVIRONMENT COURT OF NEW ZEALAND
WELLINGTON REGISTRY**

**I MUA I TE KOOTI TAIAO O AOTEAROA
TE WHANGANUI-A-TARA**

ENV-2023-WLG-000005

Under the Resource Management Act 1991

In the matter of the direct referral of applications for resource consent and notices of requirement under sections 87G and 198E of the Act for the Ōtaki to North of Levin Project

By Waka Kotahi NZ Transport Agency

**STATEMENT OF EVIDENCE OF DANIEL JOHN PARKER
ON BEHALF OF WAKA KOTAHI NZ TRANSPORT AGENCY**

ARCHAEOLOGY

Dated: 4 July 2023

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INTRODUCTION

1. My full name is **Daniel John Parker**.
2. I am an archaeologist and director of inSite Archaeology Limited.
3. I prepared Technical Assessment L: Archaeology (**Technical Assessment L**) as part of Volume IV of the Assessment of Environmental Effects (**AEE**), which accompanied the application for resource consents and notices of requirement for designations (**NoRs**) lodged with Manawatū-Whanganui Regional Council (**Horizons**), Greater Wellington Regional Council (**GWRC**), Horowhenua District Council (**HDC**) and Kāpiti Coast District Council (**KCDC**) in November 2022 in respect of the Ōtaki to north of Levin highway Project (**Ō2NL Project** or **Project**).
4. My qualifications and experience are set out at paragraph 14 of Technical Assessment L. My evidence is supplementary to Technical Assessment L.
5. I have provided advice on Archaeology matters related to the Project to Waka Kotahi since September 2013.
6. Since the consent applications and NoRs were lodged I have identified:
 - (a) one new verified archaeological site;
 - (b) new, potentially relevant, information pertaining to one previously identified archaeological site; and
 - (c) one new potential archaeological site.

Code of conduct

7. I confirm that I have read the Code of Conduct for expert witnesses contained in section 9 of the Environment Court Practice Note 2023. This evidence has been prepared in compliance with that Code. In particular, unless I state otherwise, this evidence is within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Purpose and scope of the evidence

8. Technical Assessment L assesses the actual and potential environmental effects of the Ō2NL Project on archaeological values to guide key decision

making for avoiding and minimising adverse effects on identified archaeological sites.

9. My evidence does not repeat in detail the matters discussed in Technical Assessment L. Rather, in this evidence I:
 - (a) present the key findings of Technical Assessment L in an executive summary, updated to factor in the additional work carried out since lodgement;
 - (b) provide a more detailed description of the additional work carried out, information obtained, and discussions held since lodgement, and the implications for my assessment; and
 - (c) comment on issues raised in submissions received in respect of the Project.

EXECUTIVE SUMMARY

10. Technical Assessment L assesses the actual and potential environmental effects of the Ō2NL Project on archaeological values. It addresses aspects of the Resource Management Act 1991 (**RMA**) definition of historic heritage and the Heritage New Zealand Pouhere Taonga Act 2014 (**HNZPTA**) section 6 definition of archaeological sites.
11. The RMA and HNZPTA promote the identification, protection, preservation and conservation of historical and cultural heritage, with the HNZPTA also providing a legislative mechanism, via an authority process, for the management of the modification or destruction of archaeological sites.
12. My report follows the methods and approaches set out in the Heritage New Zealand Pouhere Taonga (**HNZPT**) and Waka Kotahi guides for the assessment of archaeological sites. Aspects of my research have been coordinated with the Project Iwi Partners, with information and research advice provided when requested. I have discussed the Ō2NL Project with HNZPT and it has submitted positively on the Project's approach to historic heritage; noting the Project's extensive engagement with HNZPT prior to lodging the consent applications and signalling acceptance of the proposed Conditions DAH1 and RAH1.
13. As a result of my input on the development of the Project, key decisions to avoid or minimise adverse effects on archaeological sites were made by

Waka Kotahi during the consideration of corridor / route options for the Ō2NL Project, including the multi-criteria analysis process. Specifically, the decision to pursue an eastern corridor for the new highway and shared use path avoids a coastal landscape containing numerous pā and kāinga, hunting and cultivation grounds, colonial homesteads, battle sites, urupā and midden, amongst other sites. In doing so, the Ō2NL Project has protected the cultural and historic heritage landscape(s) from what would likely be significant adverse effects to numerous archaeological sites.¹

14. There are no listed historic places or areas on the New Zealand Heritage List / Rārangi Kōrero in the Project designation. There is only one New Zealand Archaeological Association (**NZAA**) recorded archaeological site within the proposed designations.²
15. There are no historic heritage or mana whenua / wāhi tapu sites scheduled in the GWRC Proposed Natural Resources Plan (**PNRP**), Horizons One Plan (**One Plan**), or the HDC District Plan (**HDP**) within the proposed designations.
16. There is one potentially relevant heritage site scheduled in the KCDC District Plan (**KCDP**). This site is listed as 'B70' and is a historical site located east of SH1 at the summit of Pukehou Hill. This site is outside the proposed designation and will not be affected by the Ō2NL Project. However, a heritage trail sign commemorating the site is shown in the KCDP as being within the proposed designation. This sign will not be affected; though relocation to better integrate the sign with the Share Use Path might be considered. That would be a matter for discussion between Waka Kotahi and KCDC at a later date.
17. I have identified 14 archaeological sites that will be adversely affected by the Ō2NL Project.³ Twelve of these sites are local roads built during the 19th century that are of low archaeological value. The 13th is the remains of a sawmillers' tramway of medium value (refer to Figure L.3 at paragraph 75 of Technical Report L). The 14th is a Māori forest camp of medium value recently (11 April 2023) discovered during a sand compaction trial, this is discussed further below.

¹ Parker, 2017: 17-25, MCA assessment of archaeological risks for route options.

² At the time that Technical Assessment L was submitted there were no NZAA recorded archaeological sites within the proposed designations. However, an archaeological site was recently (11 April 2023) discovered within the proposed designations during a sand compaction trial, north of Levin. The newly discovered site is discussed below.

³ Previously 13 in Technical Assessment L, see footnote 2 above.

18. There are 47 potential archaeological sites of mostly low or medium value within the proposed designations, including a newly identified 47th potential site discussed in paragraphs 23 and 24 of this evidence. Archaeological remains are generally not expected to be found at these sites, but the possibility cannot be entirely ruled out.
19. If there are any further archaeological discoveries within the construction footprint there will be limited ability to avoid affecting the relevant area. The potential adverse effects of the Ō2NL Project on archaeological sites are managed through separate applications to HNZPT for archaeological authorities. In response to the risk of discovering unknown archaeological remains, it was recommended conditions imposed on the designations and resource consents include an archaeological discovery protocol that applies until such time as archaeological authorities are in place, with such authorities addressing archaeology discoveries from the time the authority is granted. Conditions DAH1 and RAH1 are included in the conditions set to reflect this. After the new highway has been completed, any archaeological discovery protocol and information relating to archaeology will need to be updated in respect of maintenance or upgrade works outside of the construction footprint which could affect archaeological sites.
20. Overall, the Ō2NL Project (assuming the standard level of mitigation HNZPT generally expects when granting archaeological authorities) will have only negligible or minor effects on the known archaeological landscape, with the potential for mostly negligible or minor effects on unknown archaeological sites. The proposed designations:
 - (a) protect the wider archaeological landscape and avoid significant adverse effects to the dense archaeological landscapes of the Horowhenua and Kāpiti coastal dune system;
 - (b) ensure that the potential remaining effects can be appropriately managed through the use of archaeological discovery protocols and the HNZPT archaeological authority process; and
 - (c) mitigate adverse effects through positive opportunities to incorporate archaeological and cultural information in the Ō2NL Project's design framework.

WORK SINCE LODGEMENT

21. Since the application was lodged, I have been involved in further work related to archaeology as set out below.
22. I have undertaken further fieldwork to monitor the excavation of Stage 4 geotechnical test pits and a sand compaction trial for possible signs of archaeological material and to record soil profiles. One new verified archaeological site was identified during the course of this work.
23. I have also identified new information pertaining to one previously identified potential archaeological site and have identified one new potential archaeological site.

Newly identified affected verified archaeological site (forest camp)

24. Archaeological remains in the form of charcoal-stained soil and broken oven stones - interpreted as the site of a Māori seasonal / temporary forest camp - were identified during the removal of topsoil for a sand compaction trial at 170 Heatherlea East Road, Levin. There was no prior evidence from historic survey plans, archival records or micro-topographic features to suggest that archaeological remains were present at the trial site and the trial was conducted under an archaeological discovery protocol: i.e., without an archaeological authority from HNZPT. HNZPT were informed of the discovery and approved the continuation of the trial on the property, but formal excavation of the archaeological remains was not able to be undertaken and the trial site was relocated and modified to avoid causing further damage. Project Iwi Partners were also present at the time of discovery and were provided access to the site and copies of all subsequent archaeological documentation. The site was added to the NZAA recorded archaeological sites database where it is listed as site S25/189. It is site #61 in the Ō2NL Project's list of verified and potential archaeological sites and is the 14th verified archaeological site identified within the Ō2NL Project's proposed designations.
25. The site appears to be in moderate condition with some features in a good state of preservation while others appear to have been adversely affected by natural taphonomy and farming practices. Archival records indicate that Māori temporary / seasonal forest camps were historically common, though their discovery and study as intact archaeological sites is rare: therefore, rarity / uniqueness is assessed as medium and the archaeological

information value is potentially high. All other categories are assessed as low value and the overall archaeological value is considered to be medium. The archaeological remains discovered at this location are indicative of what could be found at the sites of geomagnetic anomalies that were detected by an earlier geophysical survey at Pukehou. Similar non-invasive investigations to further investigate the extent and nature of this new site are ongoing.

26. The site is situated on the centreline of the proposed new highway in an area requiring extensive and unavoidable cuts and an archaeological excavation will need to be undertaken in advance of the main construction works. Remedy for adverse effects will be managed via the HNZPT archaeological authority process as outlined in paragraphs 103 to 105 of Technical Assessment L and the predicted mitigated effect is expected to be minor for the same reasons outlined in paragraph 20 of Appendix L.4 of Technical Assessment L. Design changes to avoid this site are not recommended for the same reasons outlined in paragraph 84 of Technical Assessment L: namely, there is a reasonable expectation that other similar unknown sites are present in the immediate landscape and that any measures to avoid this site will likely only result in effects to other, and as of yet unknown, sites.

New information: potential archaeological site #45

27. The previously identified potential archaeological site #45 – situated at 34 Arapaepae Road, Levin – is a house site, with additional out-buildings, tentatively identified on the basis of the appearance of the main building and the established garden as visible in an early aerial photograph. New information sourced from a pamphlet produced by the Levin Dairy Company to mark their 75th anniversary (in 1974) noted that “*Mr W.J. Reading, whose farm at the corner of Arapaepae Road and Queen Street was the site of one of the first creameries in the district*” and that he had “*made butter under primitive conditions and sent it to Wellington for sale*”. It is not possible to link potential archaeological site #45 and the Reading home / creamery with 100% certainty, but it is highly probable.
28. The likely association with a known nineteenth century personality and early agricultural pioneer in the Levin area increases the rarity / uniqueness and historic archaeological values of site #45. This increases the overall total archaeological value of this site from low to medium. In the absence of a 100% certain relation to W. J. Reading, the site retains a moderate

archaeological potential and the predicted mitigated effect remains negligible. Both the main house and out-buildings are inside the Ō2NL Project's designation but outside of the construction footprint, therefore there is scope to avoid or minimise effects to a negligible level.

Newly identified affected potential archaeological site (sawmilling tramway)

29. A second sawmilling tramway and potential archaeological site has been identified to the south of the Prouse homestead ('Ashleigh') and the Queen Street East Road. This is the 47th potential archaeological site that may be adversely affected by the Project, referred to in the executive summary above.
30. This section of tramway was identified from a sketch plan prepared by Leslie Adkin to illustrate the locations and aspects of photos taken by his uncle Frank Denton. The location and extent of the new tramway site are not able to be defined as precisely as that for the verified site #7 that was accurately documented in a historic survey plan, but the sketch is sufficient for an approximate location to be defined. The indicative archaeological values of this new potential site (#60)⁴ are the same as those for the sawmilling tramway that is verified site #7, however this new site is assessed to have only moderate archaeological potential as the survival of physical remains has not been verified. In the event that archaeological remains of this new tramway have survived and are encountered during construction of the Ō2NL Project the predicted mitigated effect is expected to be negligible for the same reasons outlined in paragraph 94 of Technical Assessment L.

Implications of new information for my assessment

31. This new information pertaining to potential archaeological site #45 and the identification of two new archaeological sites – a sawmilling tramway as potential archaeological site #60 and a Māori seasonal / temporary forest camp as verified archaeological site #61 – does not change my previously stated opinion that the Ō2NL Project will have a minor impact on the known archaeological landscape and that the adverse environmental effects are expected to be negligible.

⁴ That is the next number in the sequence, which covers all identified verified and potential sites (whether or not they will be directly affected).

Engagement with stakeholders

32. I was also involved in post-lodgement engagement with project iwi partners. This has included ongoing geotechnical testing and communication about the new archaeological discoveries noted above.

COMMENTS ON SUBMISSIONS

Heritage New Zealand Pouhere Taonga

33. HNZPT has submitted positively on the Ō2NL Project and considers the proposed conditions relating to archaeology appropriate. I have engaged with HNZPT in order to ensure that the Project's approach to archaeology is in keeping with its expectations for best practice.

Prouse Trust Partnership / SJ & KM Prouse, 1024 Queen Street East, Levin

34. Steven and Karen Prouse have submitted in respect of their property, 'Ashleigh', situated at 1024 Queen Street East, Levin. The house and surrounding buildings pre-date 1900 and are therefore archaeological sites. However, the house and buildings will not be physically affected by the Ō2NL Project and the matters they raise relating to air quality, built heritage, construction noise and effects, flooding etc, are best addressed by other subject matter technical experts.

COMMENTS ON THE COUNCIL REPORTS

35. The section 87F and 198D reports do not discuss the Project's archaeology effects. Horizons, GWRC, KCDC and HDC did not engage an archaeological expert to comment on Project archaeological effects.

Daniel John Parker

4 July 2023