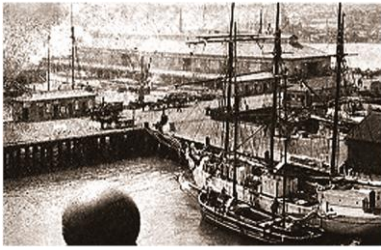


Section 92 Response Attachments

Attachment 4 - Archaeology



Clough

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26 November 2012

Ms Alia Cederman

Tonkin & Taylor Ltd
PO Box 5271
Wellesley Street
Auckland

Dear Alia,

Re. S92 response: Central Interceptor Main Project Works

The following comments have been written in response to comments by V. Tanner (Auckland Council; dated 18/09/2012) regarding the archaeological assessment for the Central Interceptor Project. Ms Tanner recommended:

- An assessment is undertaken of the effects the proposal will have on the historic values associated with the present wastewater system, much of which was constructed in the early 20th century.
- That a more comprehensive archaeological assessment is undertaken of the 16 proposed main works construction sites where archaeological assessment has not yet taken place.
- That an assessment of effects on historic heritage as a matter of national importance under s 6 (f) the RMA is provided for the proposed Central Interceptor.

The methodology undertaken for the archaeological assessment is considered to be sound, with subsurface testing undertaken at the construction sites deemed to have archaeological potential based on historic and archaeological research, topography, past modification and present land use. As such, no further subsurface testing or assessment is considered necessary at the 16 secondary construction sites.

Regarding effects on the present wastewater system, further research has established that the majority of the present wastewater system was built in the 1950s (the Manukau Scheme), with only a small area of the system in Western Springs built in the early 20th century (opened in 1914) as part of the Orakei wastewater system relevant to the Central Interceptor main project. The affected sections of the wastewater system are considered to have low historic heritage value due to their largely mid-20th



century date. Any effects on historic values from the proposed Central Interceptor would be less than minor as the proposed works involve connection points only.

The archaeological assessment has established that in all areas the effects of the proposal on archaeological values are likely to be less than minor. While Ambury Park has archaeological sensitivities, works proposed here are no longer surface works but will involve tunnelling well below ground level and there will be no effects. Any effects on the present waste water system are also likely to be less than minor. Therefore any effects on historic heritage under S6(f) of the RMA from the proposed Central Interceptor are considered likely to be less than minor.

The S92 request also notes that 'Mitigation of effects on archaeology under the provisions of the Historic Places Act is not necessarily considered mitigation of effects under the Resource Management Act'. We agree that in cases where effects on archaeology are more than minor and/or where there are good opportunities for mitigation under the RMA in addition to archaeological investigation and recording, these opportunities should be taken. However, in this case we consider the most appropriate form of mitigation of what are likely to be minimal (if any) effects on archaeology to be the development of Accidental Discovery Protocols, and investigation and recording of any remains under a Historic Places Act Authority. We note that under S108(4) of the RMA this kind of investigation and recording is provided for and would clearly be an appropriate condition of consent were it not for the fact that the archaeological provisions of the Historic Places Act make this ultra vires.

Yours sincerely,

Rod Clough PhD (Lond)

Director

and **Sarah Phear** PhD (ANU Canberra)