

FURTHER CONSIDERATIONS

The following considerations have contributed to our assessment and are of concern.

1. Consent was granted for the previous subdivision RM 180160 in a known cultural landscape with little consultation with tangata whenua. Earthworks were not monitored for cultural features or artefacts.
2. A signature on a subdivision plan was accepted as evidence of consultation.
3. Earthworks have occurred in the area proposed in the current subdivision RM 220003 application that was not monitored for cultural features or artefacts.
4. Future subdivision and more development planned in the future.
5. Possible damage to cultural sites as earthworks for a track for access out to Paoanui Point and a hut was not monitored for cultural features or artefacts.
6. Drainage capacity of the area proposed for subdivision as it was a wetland. This is compounded with on-site underground effluent disposal and possible leaching into the groundwater and adjacent waterways.
7. Water quality and the health of the flora and fauna within the waterways.
8. Inshore coastal environment and the health of the flora and fauna of the moana.
9. Development of flat and productive farmland.
10. Analysis of Section 12.1 of the Assessment of Effects on the Environment (AEE) by CF Consulting Services Limited finding the 'actual and potential adverse effects of the proposal are assessed as minor'. We insist the actual and potential adverse effects of the proposal are definitely more than minor.
11. The last sentence on Page 11 of the Hudson Associates (2021) Landscape Assessment appears to have been added on as it is a smaller font size?

12. Close proximity of the proposed subdivision to known locations of Māori occupation including the Native Reserve, pā and urupā.
13. Proposed subdivision is on land that was a part of the 1851 Waipukurau purchase and did not pass through the Native Land Court, therefore is land where documented Māori history is sparse.
14. Planting of native vegetation in an archaeological site is also an offence (HNZPT Act 2014).

CONFIDENTIAL

CONCLUSION AND RECOMMENDATIONS

The purpose of this report is to provide an assessment of cultural values and effects of the proposed subdivision by James Bridge at Pourērere Beach.

Understanding the context of the whole cultural landscape is important to us. We do not view our sites in isolation but rather as a physical and metaphysical environment, taonga tuku iho passed down to us. The sites are tangible reminders left in the landscape and are vital to us as Māori, for our identity and our well-being. Not only do the sites connect us physically to the land, but also spiritually to our ancestors, connecting living communities in the present with our past, our history. It is vital that we as kaitiaki protect these wāhi taonga, wāhi tapu for our rangatahi, our future generations.

Based on all the information provided in this report, it is recommended that:

- An Archaeological Authority is applied for under s. 48 of the Heritage New Zealand Pouhere Taonga Act 2014 for all the work associated with this proposed subdivision.
- Earthworks are monitored by an archaeologist or suitably qualified person.
- Any cultural features are investigated by an archaeologist using accepted archaeological methods.
- Any taonga Māori/ taonga tūturu found are excavated in an appropriate way, reported to the hapū, registered under the Protected Objects Act 1975 and returned to tangata whenua.
- Any cultural material including faunal material uncovered is identified and analysed by appropriate specialists.
- Any suitable cultural material that will provide information about the approximate age of the site is sampled and sent away for C¹⁴ analysis.
- An archaeological survey is undertaken of the coastal hills around Paoanui Point as this is an important cultural landscape. The survey will identify, record, and update SRFs with the intent of preventing any cultural sites from being inadvertently damaged in the future. It will also include identifying any cultural sites that are presently at risk.
- An Accidental Discovery Protocol is followed should koiwi tangata/ human remains be disturbed, and

- Communication and consultation with KLT is open and maintained by the applicant and the CHBDC from this point forward for the rest of this RMA process.

The KLT would like the CHBDC to clarify and assure us that:

- poor drainage and underground effluent disposal will not contaminate the land (Papatūānuku) and adjacent waterways with human waste.
- there is no significant risk to the proposed subdivision from natural and coastal hazards, and
- KLT is made aware of any variations to this application.

If subdivision consent is granted, it is recommended that:

- The streams have wide riparian margins that are more than sufficient to reduce erosion and contamination.
- No direct discharge of any sort into the streams or dams.
- Regular water monitoring of the streams and dams to ensure there is no contamination.
- Regular monitoring of the coastal environment to ensure that kaimoana is safe to eat, and
- Areas of coastal and riparian planting are surveyed for cultural sites prior to planting.

If our recommendations and any conditions of the Archaeological Authority are followed, the effects of the proposed subdivision on our cultural values will be moderate.

We would be willing to assist with more information if we can.

We need to reiterate that this CIA and our views are based on one site visit on 15 September and discussions at a hui in March 2022. Our views and/ or recommendations may vary if other parties have made or make significant changes to this proposed subdivision.

Ngā mihi,

Stella August (on behalf of Kairakau Lands Trust)