Response to

MMA-PLA-RMA-LTR-3288

Response to request for further information on the Mt Messenger Bypass Project

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1.0 Introduction

As part of the New Zealand Transport Agency's (NZTA) Mt Messenger Bypass project, an Historic Heritage Assessment (HHA) was commissioned by NZTA and prepared by Clough and Associates (Clough & Associates, 2017) as part of the project Assessment of Effects on the Environment(AEE) report for the project. Geometria was commissioned by New Plymouth District Council to review this report and gave their findings in October 2017. As a result of Geometria's review (Geometria Ltd., 2017), a letter was sent on 22 March 2018 to the Mt Messenger Alliance requesting more information (including requests from other specialists). A response was received from Mt Messenger Alliance on 6th April 2018, and this report addresses this response.

2.0 Responses

This section will address each response in detail, referencing the paragraph numbers (39-48) referenced under "Historic Heritage" in the document MMA-PLA-RMA-LTR-3288.pdf.

Paragraph 39

The Historic Heritage Assessment prepared by Clough and Associates (HHA) does not include reporting on visual inspection of the northern (Pascoe) property. The Pascoe property is an area of interest archaeologically due to the landscape being more suitable for early occupation than the surrounding rugged terrain. Please clarify whether an archaeological survey for the selected route been carried out, which may validate assumptions made in the HHA, and provide further information in this regard. If not, is it likely to be carried out prior to the Hearing?

Response: Archaeological survey of the Pascoe land within the Project area has now been undertaken. No archaeological or other historic heritage sites were identified within the footprint of the Project route within the Pascoe land, either through historical information, previous investigations, or the field survey. As noted in Section 6.1 of the Historic Heritage Technical Report (December 2017), it is considered unlikely that there was significant Maori occupation of the Mangapepeke Valley because of its frequent flooding and steep inaccessible upper valley sides, although the valley may have been used by Māori to access inland areas.

This response addresses the original concerns. The response has addressed the area that was not able to be addressed in the original HHA.

Paragraph 40

The HHA suggests that the area was primarily a source of raw materials, and if this was the case then one would expect associated archaeological sites in the vicinity of the resource locations. Please provide examples of archaeological features that could be present in the project area, and greater detail on the archaeological potential, or "significance" of these features.

Response: As noted in Section 6.1 of the Historic Heritage Technical Report, the steep inland bush country around Mount Messenger would generally have been unsuitable for intensive Māori occupation and use, which was focused along the coastal plains, but would have provided a source of raw materials.

The reference to raw resources relates to the hunting and gathering of birds, rats, and plant materials - Mahinga kai. Activities such as these rarely leave archaeological traces that are likely to survive. Occasionally the archaeological remains of tracks, isolated camp sites, or refuge Pa may be found in less hospitable areas of settlement. The archaeological evidence of raw material gathering is usually found back in the settlement sites as bird bones, pollen and phytoliths contained in midden sites.

This response and clarification addresses the original concerns. As noted by Clough and Associates, the likelihood of mahinga kai presenting archaeological traces is very low.

Paragraph 41

The project area is in proximity to the confiscation line created by the 1863 New Zealand Settlements Act, which resulted in land seizure having a devastating effect on iwi settlement patterns in the area. Please provide a discussion of this to help inform the archaeological potential of the area.

Response: Information about the Treaty settlement process (including the 1863 Act) will be addressed in evidence. This is not relevant to the Historic Heritage assessment.

This response does not address the potentially large-scale settlement pattern changes in the wider area brought about by the 1863 Act, but if the effects of the Act are addressed in evidence then this should address the concerns raised.

Paragraph 42

The existing Mt Messenger road is a piece of pre-1900 infrastructure and there are archaeological and historic heritage values associated with this section of the road. Please identify the historic heritage values and outline how these may be affected during the development of the bypass in terms of service and lay-down areas and possible modifications outside the main corridor identified in the HHA.

Response: The proposed works will not affect the existing Mt Messenger road. Continuous road maintenance, widening and alteration over the Mt Messenger section of SH3 throughout the 20th century is likely to have removed any evidence of these kilns and quarries in the roadside banks.

This clarification addresses the original concerns adequately by confirming that the existing Mt Messenger Road will not be affected by the proposed works.

Paragraph 43

Please address the possibility of encountering and disturbing remnants of papa kilns, original burnt papa roading surface or papa quarry sites within the wider project area, and your proposed response.

Response: Our heritage expert has confirmed that no evidence was found along the SH3 Mt Messenger Road alignment of the roadside papa kilns or papa quarry sites that were dug away from the road banks for road metal from 1909. Continuous road maintenance, widening and alteration over the Mt Messenger section of SH3 throughout the 20th century is likely to have removed any evidence of these kilns and quarries in the roadside banks.

See responses below for further information on this question.

This clarification addresses the original concerns adequately as the papa kilns, papa roading and papa quarry remnants have now been addressed.

Paragraph 44

Please advise whether the proposed works will impact on the Mount Messenger Tunnel, which has been identified as having a high contextual, historic and social value, moderate cultural and aesthetic value. Response: The proposed works will not affect the existing Mount Messenger tunnel.

This clarification addresses the original concerns adequately by confirming that the Mount Messenger tunnel will not be affected by the proposed works.

Paragraph 45

The HHA historical background considers the historic formation of the road. Please provide an assessment of the heritage values and significance of the existing road, bearing in mind that infrastructure sites such as the papa kilns, tunnel, historic road and resource gathering locations have a relatively low representation in the archaeological record.

Response: The heritage values and significance of the existing road are described in the Historic Heritage Technical Report. Continuous road maintenance, widening and alteration over the Mt Messenger section of SH3 throughout the 20th century is likely to have removed any evidence of the kilns and quarries in the roadside banks.

This response, along with the clarifications made in 43 address the original concerns regarding the historic road formation and associated detritus.

Paragraph 46

Presently, it is uncertain what will happen to the existing SH3 after development of the bypass. How might threats to existing historic heritage values be addressed into the future, should the existing corridor be revoked? What are the implications for heritage management, if any?

Response: As above the revocation process is ongoing.

This question has been largely answered by responses 42-45, pending clarification of the ultimate fate of the original road.

Paragraph 47

During the site visit on 19 September 2017, Geometria Archaeologist Daniel McCurdy noted an area of possible archaeological interest along the historic pack track from the rest area at the top of Mount Messenger, where the ridgeline above the modern access road (originally the pack track and possibly a Maori ara (pathway) before that) shows some evidence of anthropogenic modification - the ridgeline exhibits signs of terracing and two possible transverse defensive ditches. This location is one of the highest points east of Mount Messenger, providing an exceptional viewshed down the Mangapepeke valley to the north and the Mimi valley to the south, across to Mount Taranaki, and is above (approximately) where the proposed tunnel would be constructed. The location would have been suitable for either a small pa or defended sentry post, with exceptional natural defences and sight lines. Please advise whether this area was examined during the HHA. If not, please carry out further investigation and advise on the findings. It is likely that this location is well enough removed from any works related to the proposed bypass route, but we request any potential implications for this potential site be addressed.

Response: The Historic Heritage Technical Report referred to survey plan SO 982 (1897), which shows a pack track heading east from the top of the Mount Messenger Road, in the vicinity of what is today the summit rest area. A remnant of this pack track was relocated during field survey in March 2018, and this feature was mistakenly identified by Daniel McCurdy (Geometria) as 'terracing and two possible transverse ditches''. The Project will not affect this feature.

It is not clear from this response that the features being referred to are the same as were raised in the original question, but if this area will not be affected by proposed works then the original question is extraneous to the project. If the area in which the features are located will not be disturbed then this response adequately addresses the original concerns.

Paragraph 48

Please assess the archaeological effects with reference to the detailed plans of the proposed works, so that specific details such as the location of access roads and vehicle access points, storage areas, electrical and/or water infrastructure installation, fencing and vegetation removal can be considered in relation to historic heritage.

Response: These details have been assessed - see the historic heritage technical report. Please describe how earthworks should be managed to best mitigate damage to any previously unrecorded archaeological sites.

Conditions of consent are proposed to address accidental discovery and also the discovery of archaeological sites and koiwi tangata. The Accidental Discovery Protocol (Appendix M to the CEMP) also provides measures to mitigate damage to any previously unrecorded archaeological sites. This ADP is consistent with the Transport Agency's Accidental Archaeological Discovery Specification (P45).

This response addresses the original concerns. As no historic heritage has been identified by Clough and Associates, an Accidental Discovery Protocol is a suitable mitigation measure for disturbance to any previously unrecorded archaeological features.

3.0 Conclusions

The Mt Messenger Alliance responses detailed in MMA-PLA-RMA-LTR-3288 largely address the concerns raised in the initial report by Geometria. An outstanding issue remains in paragraph 41, regarding the potentially large-scale settlement pattern changes in the wider area brought about by the 1863 New Zealand Settlements Act, but as this is noted as being addressed in evidence, then this concern should be addressed at a later date.

With the noted exception of paragraph 41, the responses from Mt Messenger Alliance have sufficiently addressed the original concerns.

4.0 References

Clough & Associates. (2017). *Mt Messenger Bypass: Historic Heritage Assessment.* Unpublished report to NZTA.

Geometria Ltd. (2017). Archaeological Review: Mt Messenger Bypass Historic Heritage Assessment. Unpublished report to new PLymouth District Council.