

**Archaeological Survey and Assessment of Effects:
Pukekohekohe Gateway Plan Change
222/250 Manukau Road, Pukekohe 2120**



Prepared for:

Adam Sadgrove
Auckland Thoroughbred Racing
via email: adams@ellerslie.co.nz

Prepared by:

Archaeology Solutions Ltd
PO Box 48134
Blockhouse Bay
AUCKLAND 0644
phone: (021) 626 789
e-mail: hans@archaeologysolutions.co.nz

www.archaeologysolutions.co.nz

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1. Executive Summary

There are no previously recorded archaeological sites in the study area, and no new archaeological sites were discovered during the study.

The sequence of aerial photographs and historic maps from 1905 (early subdivision map) and between 1942 and today shows that nearly the entire study area was subjected to earthworks in the 20th century.

The drained swamps that are today the racecourse were the closest swamps to Pukekohekohe pā. It is therefore likely that wooden artefacts have been stored in the swamps. But the drainage of the swamps together with other earthworks will have aerated the swamps and most likely any wooden artefacts have turned to soil by now. There is a small risk of encountering wooden artefacts in surviving peat layers.

One building is pre 1940 and could be considered to have some historic heritage values, which could be recorded to Level III – basic recording (Archaeological Guidelines Series No.1, Investigation and recording of buildings and standing structures, Heritage New Zealand Pouhere Taonga 2018).

The racecourse was used during WWII as a camp for the Defence Force and American troops. A mix of tents and sheds were used. The existing buildings and the land were leased from the Franklin Racing Club. In 1943, 1800 marines were in camp at the racecourse. Any subsurface remains of this occupation are post 1900 and therefore not an archaeological site under the definition provided in section 6 of the Heritage New Zealand Pouhere Taonga Act 2014. But as remains of a historically significant event – New Zealand hosting Allied Forces during WWII – they could be deemed of having historical value under the Auckland Unitary Plan: Operative in Part (AUP:OP) and information could be obtained using archaeological methods including excavations.

None of these features with some post 1900 historic heritage values seems to be sufficiently significant to schedule them under the criteria of the AUP:OP. Nonetheless, the remaining historic values could be preserved through documentation, and it is recommended here that a pro-active approach is taken to the issue at the time of future earthworks or development. This will also minimise the risk of any delays to the initial earthworks.

It is recommended that any development is undertaken with an Accidental Discovery Protocol in place to mitigate the small residual risk of encountering pre 1900 archaeological features.

It is recommended to consult with the Heritage Team at Auckland Council regarding the pre-1940 building. A basic documentation – Level III – of the inside and outside of the building using photogrammetry is suggested.

It is recommended to have archaeological and cultural inductions to any earth work crews, as the subject site is close to a wetland that might have been utilised in pre-Contact times.

This survey and report do not necessarily include the location of wāhi tapu and/or sites of cultural or spiritual significance to the local Māori community who may need to be consulted for any information or concerns they may have regarding the proposed works.

Consultation with mana whenua is ongoing at the time this report was written, and the author has reviewed the Cultural Values Assessments available at the time of writing.

Quality Information

Title: Archaeological Survey and Assessment of Effects: Pukekohe Park
Pukekohekohe Gateway Plan Change, 222/250 Manukau Road, Pukekohe
2120

Author: Dr Hans-Dieter Bader

Cover photo: 1942 aerial of Pukekohe Park (retrolens)

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2. *Introduction*

2.1. Purpose and Scope

Auckland Thoroughbred Racing (ATR) propose a plan change for part of the site at 222-250 Manukau Road, Pukekohe 2120 ("Pukekohekohe Gateway Plan Change Area"). As part of the Pukekohekohe Gateway Plan Change Application a check for potential archaeological and historic heritage values of the Pukekohekohe Gateway Plan Change area is sought.

This document reports on the archaeological findings after background research, a site visit and a cultural induction by tangata whenua.

Soil cores were considered to be taken but the existing modern surfaces seem to be vastly disturbed.

2.2. Project Description

An application to Auckland Council will be made to rezone the Plan Change area from Special Purpose – Major Recreation Facility Zone to Mixed Housing Urban Zone (MHUZ) and Open Space – Informal Recreation Zone to enable residential development of the site.

2.3. Map of Location



Figure 1: Location of study area south of Pukekohe (red outline).

3. Statutory Requirements

There are two main pieces of legislation in New Zealand that control work affecting archaeological sites. These are the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) and the Resource Management Act 1991 (RMA)

This assessment considers archaeological sites as defined in the HNZPTA and historic heritage sites as defined by the RMA and the AUP:OP.

3.1. Heritage New Zealand Pouhere Taonga Act 2014

Heritage New Zealand Pouhere Taonga (HNZ) administers the HNZPTA. The HNZPTA contains a consent (authority) process for any work affecting archaeological sites, where an archaeological site is defined as:

- "6(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*
- 6(b) includes a site for which a declaration is made under section 43(1)"*

Any person who intends to carry out work that may damage, modify or destroy an archaeological site, or to investigate a site using invasive archaeological techniques, must first obtain an archaeological authority from HNZ. The process applies to sites on land of all tenure including public, private and designated land. The HNZPTA contains penalties for unauthorized site damage or destruction.

The archaeological authority process applies to all sites that fit the HNZPTA definition, regardless of whether:

- The site is recorded in the NZ Archaeological Association Site Recording Scheme or registered by HNZ,
- The site only becomes known about as a result of ground disturbance, and/ or
- The activity is permitted under a district or regional plan, or a resource or building consent has been granted

HNZPT also maintains The New Zealand Heritage List Rārangi Kōrero of Historic Places, Historic Areas, Wāhi Tupuna/Tipuna, Wāhi Tapu and Wāhi Tapu Areas. The List Rārangi Kōrero includes some significant archaeological sites. The purpose of The List Rārangi Kōrero is to inform members of the public about such places and to assist with their protection under the RMA.

3.2. Resource Management Act 1991

The RMA requires City, District and Regional Councils to manage the use, development, and protection of natural and physical resources in a way that provides for the wellbeing of today's communities while safeguarding the options of future generations. The protection of historic heritage from inappropriate subdivision, use, and development is identified as a matter of national importance (section 6f).

Historic heritage is defined as those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, derived from archaeological, architectural, cultural, historic, scientific, or technological qualities.

Historic heritage includes:

- historic sites, structures, places, and areas
- archaeological sites
- sites of significance to Māori, including wāhi tapu
- surroundings associated with the natural and physical resources (RMA, section 2).

These categories are not mutually exclusive and some archaeological sites may include above ground structures or may also be places that are of significance to Māori.

Where resource consent is required for any activity the assessment of effects is required to address cultural and historic heritage matters (RMA, 4th Schedule and the AUP:OP assessment criteria).

3.3. Planning Policies

The AUP:OP has specific provisions for historic heritage and places of significance to mana whenua based on the rules of the RMA. The regional policy statement objective for historic heritage (AUP:OP B5.2.1) are:

1. Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.
2. Significant historic heritage places are used appropriately, and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.

Based on the acknowledgement of Te Tiriti o Waitangi a number of regional policy statements are formulated (AUP:OP B6.2.1) that result in the recognition of Places of Significance to mana whenua.

“Sites and places of significance to mana whenua have tangible and intangible cultural values in association with historic events, occupation and cultural activities. Mana whenua values are not necessarily associated with archaeology, particularly within the highly modified urban landscape where the tangible values may have been destroyed or significantly modified.” (AUP:OP D21.1)

Policy objectives for Places of Significance to mana whenua (AUP:OP D21.2) are:

1. The tangible and intangible values of scheduled sites and places of significance to Mana Whenua are protected and enhanced.
2. Scheduled sites and places of significance to Mana Whenua are protected from inappropriate subdivision, use and development, including inappropriate modification, demolition or destruction.

Note that scheduled places have stronger protection than archaeological sites that are not scheduled in the Plan.

3.4. Non-Statutory Planning documents

The Auckland Plan 2050 sets six key outcomes, each defined by four strategic directions. These strategic directions are to be achieved through a number of focus areas for each direction.

The six key outcomes are:¹

1. *Belonging and Participation*
All Aucklanders will be part of and contribute to society, access opportunities, and have the chance to develop to their full potential.
2. *Māori Identity and Wellbeing*
A thriving Māori identity is Auckland's point of difference in the world – it advances prosperity for Māori and benefits all Aucklanders.
3. *Homes and Places*
Aucklanders live in secure, healthy, and affordable homes, and have access to a range of inclusive public places.
4. *Transport and Access*
Aucklanders will be able to get where they want to go more easily, safely and sustainably.
5. *Environment and Cultural Heritage*
Aucklanders preserve, protect and care for the natural environment as our shared cultural heritage, for its intrinsic value and for the benefit of present and future generations.
6. *Opportunity and Prosperity*
Auckland is prosperous with many opportunities and delivers a better standard of living for everyone.

Outcome 5 takes a wide view of heritage including both natural and cultural heritage and the links between them. Heritage is also linked to other key outcomes. Three specific focus areas reference heritage beyond Outcome 5:

"Outcome: Belonging and Participation

¹ Auckland Plan 2050, p. 7.

Focus Area 1: Create safe opportunities for people to meet, connect, participate in, and enjoy community and civic life.

Also, our sense of belonging is tied to identity and attachment to place. The way people use Auckland's streets, squares, parks and other public open space influences the meaning they attach to these places and spaces. Heritage, particularly built heritage, anchors our sense of history and place and helps define what is unique and distinctive about Auckland."

(Auckland Plan 2050 p.52)

"Outcome: Belonging and Participation

Focus Area 7: Recognise the value of arts, culture, sport and recreation to quality of life.

Appreciation of our cultural heritage, especially our built heritage, is an equally important aspect of what contributes to our quality of life. It reminds us of our past and provides a visual context of where we have come from. It is one aspect of our culture that is easily observed and there for everyone to see and appreciate."

(Auckland Plan 2050 p.63)

"Outcome Homes Places and Spaces

Focus area 5: Create urban places for the future.

Placemaking plays an important role in creating high quality urban environments. It also supports our culture and identity, such as Auckland's unique Māori cultural identity, in our public places. We can also reflect and embed our unique local character in the built environment by, for example, incorporating and integrating built heritage and public art into existing and new spaces."

(Auckland Plan 2050 p.101)

Both these plans contain direction on the protection of cultural heritage, beyond the pre-1900 features subject to the HNZPTA (which are also regulated by the Accidental Discovery Protocol in the AUP:OP) and physical features. It is also clear that both built heritage and subsurface heritage (archaeology) are linked and must be seen in context.

One main additional outcome of the Auckland Plan 2050, beyond the regulatory framework, is the need to present and communicate any outcome or new insight into the history of an area to the wider community.

4. *Methodology*

4.1. Investigation Methodology

This assessment was carried out using both desktop research and a site visit in August 2024.

4.2. Desktop Research Methodology

Sources for desktop research include:

- NZ Archaeological Association (NZAA) online site recording database Archsite and associated site records
- LINZ database of historic maps and survey plans via Quickmaps
- HNZ Heritage List/ Rārangi Kōrero of historic places, historic areas and wāhi tapu areas
- HNZ online reports database
- Auckland Council Geomaps GIS viewer
- Auckland Council Cultural Heritage Inventory (CHI)
- Auckland Council Archives (online resources)
- Secondary sources of local history
- Oral traditions as shared during the cultural induction, 30th August 2024

5. Physical Environment

The subject site is an alluvium swamp within the South Auckland Volcanic Field. It is surrounded by highly fertile soils and rolling hills. The swamp was the closest wetland to Pukekohe Hill, prior to the wetlands on the subject site being drained before 1942 to develop the land for racing and agricultural purposes.

Map of the South Auckland Volcanic Field. DRAWN BY GEOFF COX.

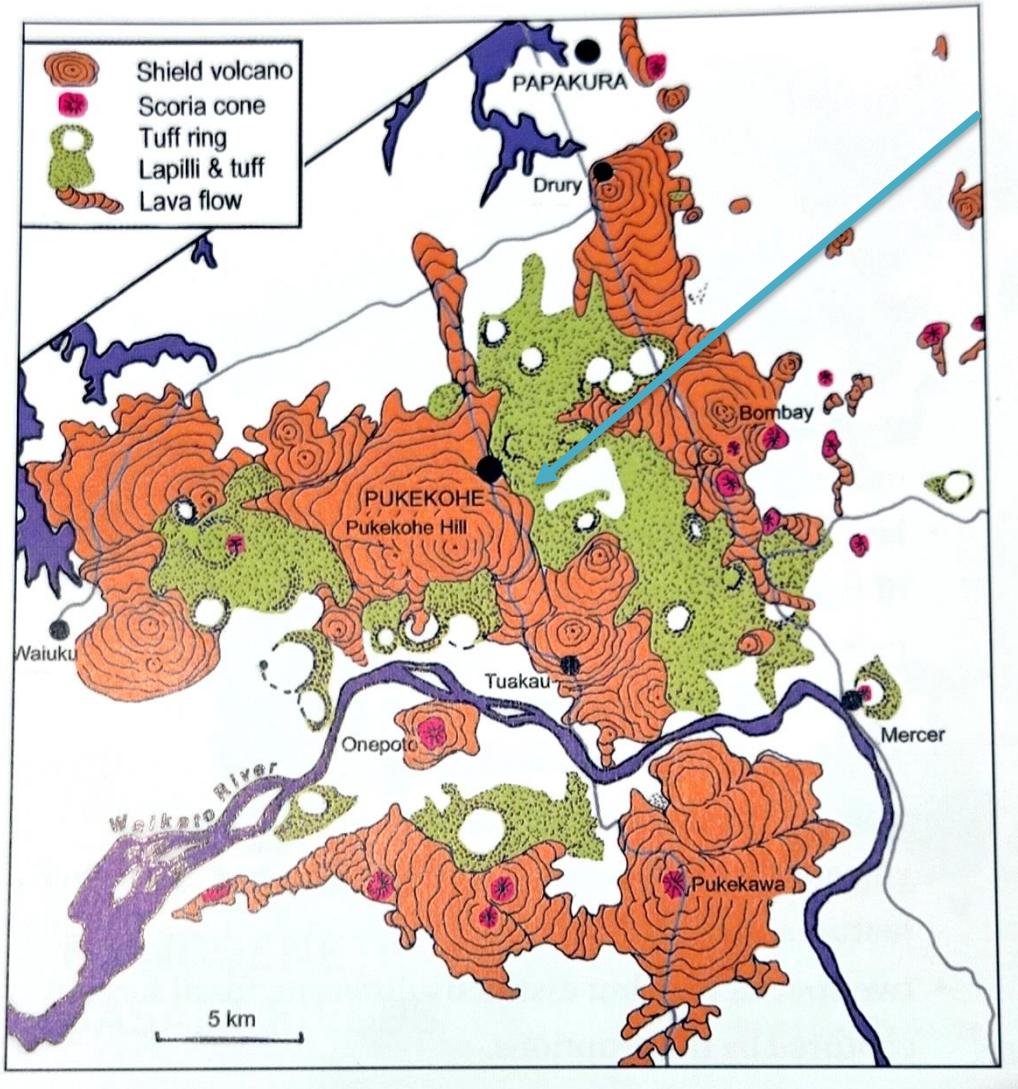


Figure 2: Pukekohe shown in the middle of the South Auckland Volcanic Field (from Volcanoes of Auckland p.96). Blue arrow indicates the study area.

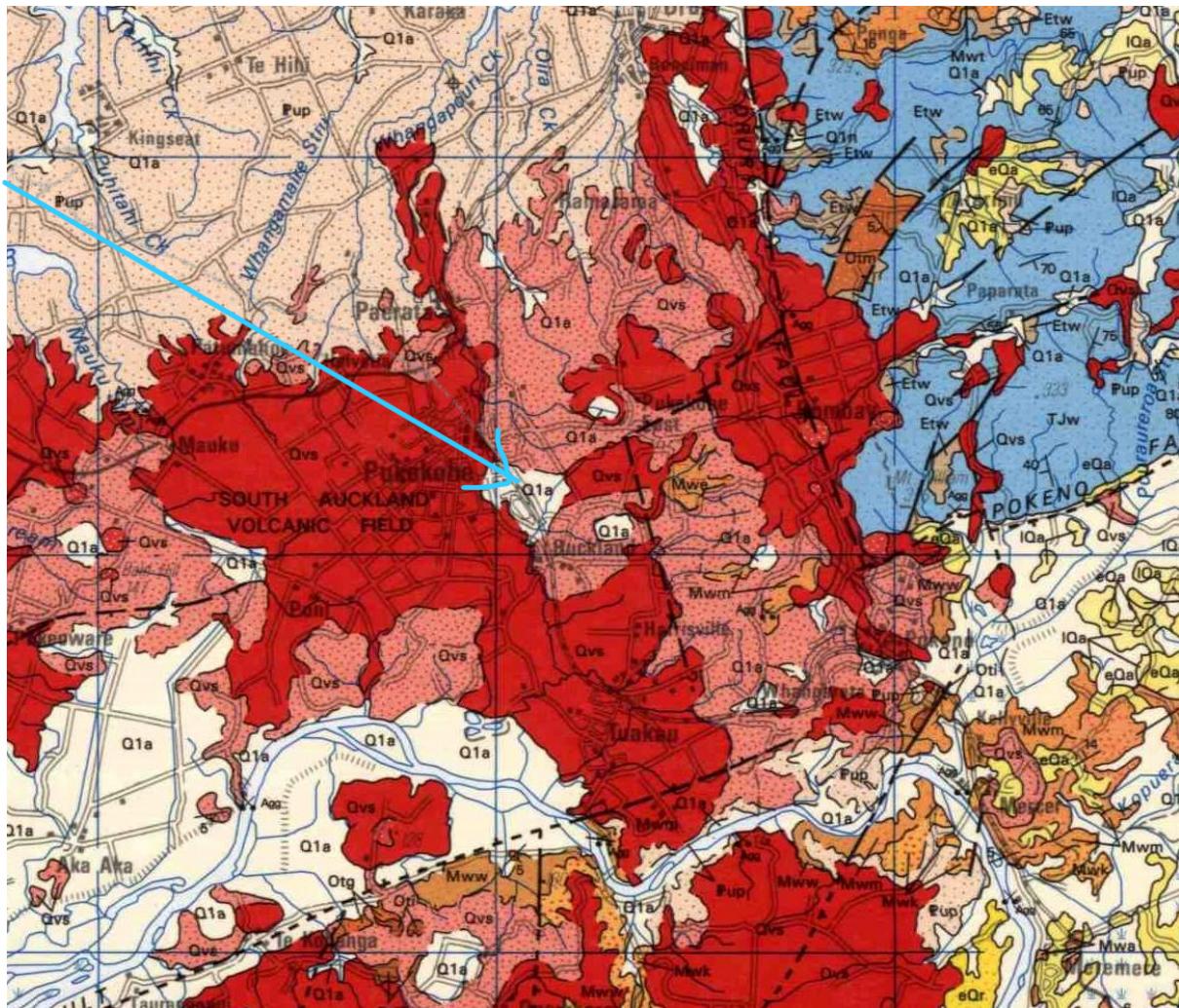


Figure 3: Pukekohe Park Racecourse (blue arrow) shown as alluvium/swamp fill (in light brown) surrounded by fertile volcanic soil (in red) (Auckland geological map by GNS Science - Te Pū Ao).

6. *Historical Background*

6.1. Māori Settlement History

The history of Tāmaki Makaurau is long and eventful. Many hāpu and iwi have or had links to places within what we call today, Auckland.

Pukekohe hill's original name is Pukekohekohe, the hill of kohekohe, which was a prominent part of the local bush, a tree also called "the mahogany of New Zealand" (Pukekohe Heritage Survey, n.d.).

The main groups of the area were part of the Waiohua confederation, mainly Ngāti Tamaoho, Ngāti Te Ata and Te Ākitai. They valued the strategic views from the hill and the fertile soil which allowed them to have extensive māra kai (gardens) on the northern slope of the hill. The views allowed them to observe the important paths between the Waikato and the Manukau Harbour.

The battle of Mokoia in 1821 left the area thinly populated as many people fled for the safety of Waikato (Ngati te Ata 2021). Many returned in the 1830s.

6.2. Post Contact accounts

The Pukekohe Block was purchased by the Crown in 1843 (O'Malley 2016). Te Awa nui o Taikehu is a reserve the Crown created for Te Ākitai Waiohua during land sales around modern-day Pukekohe (Ngati te Ata 2021).

The Land War in 1863/64 saw most people fleeing again to the Waikato, though a small number stayed behind 'to keep the home fires burning' (ahi ka). Pukekohe East Church saw a major battle between a small number of settlers and Māori. The Church was fortified and held by the settlers until the 18th Royal Irish Regiment relieved them. At least 30 Māori were killed during this battle (O'Malley 2016).

In 1865 large tracts of land around Pukekohe were confiscated by the Crown and the settlement of Pukekohe (named after 'Pukekohekohe') established north of the hill. Settlers were drawn into the area and by 1870s market gardens started to be established. In 1875 the extension railway line to Mercer connected Pukekohe to the expanding market of Auckland and the population of Pukekohe saw a large growth.

The completion of the main trunk railway in 1907 allowed access of the produce from Pukekohe to some major towns in the North Island. The expansion of the market gardens saw Indian and Chinese market gardeners coming into the area which led to the creation of the 'White New Zealand League' in 1925, a white supremacy group that petitioned the government to send those Indian and Chinese market gardeners back to their homelands. The petition was dismissed in 1934.

During the 1930s rural Māori moved to the urban areas including Pukekohe to find work as labourers. In Pukekohe this led to a racial segregation:

“There was a time when Māori were: barred from public toilets, segregated at the cinema & swimming baths, refused alcohol, haircuts & taxi rides, forced to stand for white bus passengers, not allowed to attend school with other students. It happened in the South Auckland town of Pukekohe. From 1925 to the early 1960s, hundreds of Māori infants and children died there in the racially segregated slums where they were forced to live in shacks and manure sheds on the edge of town, away from European residents.” (Bartholomew 2020)

This led to substandard living conditions for many Māori in Pukekohe and high infant death rates from preventable diseases well into the 1960s. As late as 1952, segregated schools were established by the government under pressure from European residents.

Between 1942 and 1944 several camps were established to host US forces as a staging point for the War in the Pacific. One of these camps was established in the study area and hosted up to 1800 marines (RUB South Cultural Heritage Overview Report 2013).



Figure 4: 1942 establishment of the army camp in the study area. The existing buildings of the Franklin Racing Club were leased and used for the camp. The building outlined in blue is the only building in the photo still standing today.

7. Previous Archaeological Work in the Project Area

There has been no previous archaeological work undertaken within the study area.

8. Archaeological Context

No historic buildings are recorded in the Cultural Heritage Inventory of the Auckland Council within the study area.

No archaeological sites were previously recorded within the study area.

The previously recorded archaeological sites in the vicinity of the study area are quite far away to the north and south of the subject site. Both are European historic sites related to the railway. The vast majority of previously recorded archaeological sites around Pukekohe are European historical sites.

The two recorded archaeological sites, R12/1195 and R12/1215, both relate to train stations of the 1870s railway line to Mercer. These are the only recorded archaeological sites within a circle of about 1.5 km around the study area.

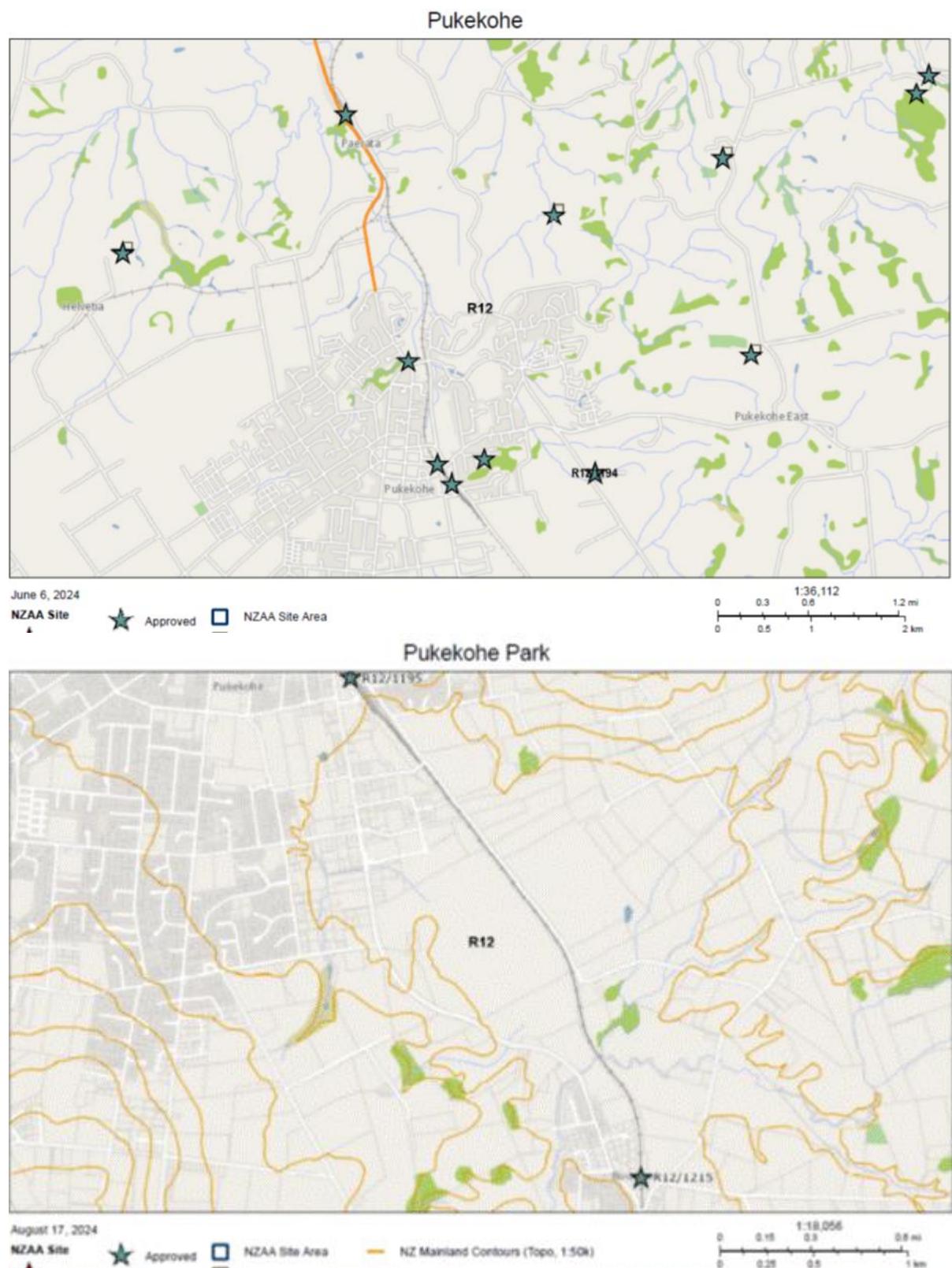


Figure 5: Two maps of the recorded sites in the vicinity of the study area (stars = approved archaeological sites within the map sheet R12). The two sites closest to the study area are European heritage sites relating to the railway. (ArchSite 2024, NZAA).

9. Results of Fieldwork and Research

The geological map (Figure 3) suggests that the horse racecourse including the lowest part of the study area were once a swamp before it was drained during the 19th and beginning of the 20th century. It seems likely that this swamp was the closest swamp to Pukekohekohe and the māra kai (gardens) on its slope. Therefore, it is likely that this wetland was used to hide or store wooden tools and taonga. Draining the swamp and ploughing it would most likely expose any wooden artefacts to air and rot. Nonetheless there is still a very small chance that some wooden artefacts escaped the modern earthworks and the exposure to air.

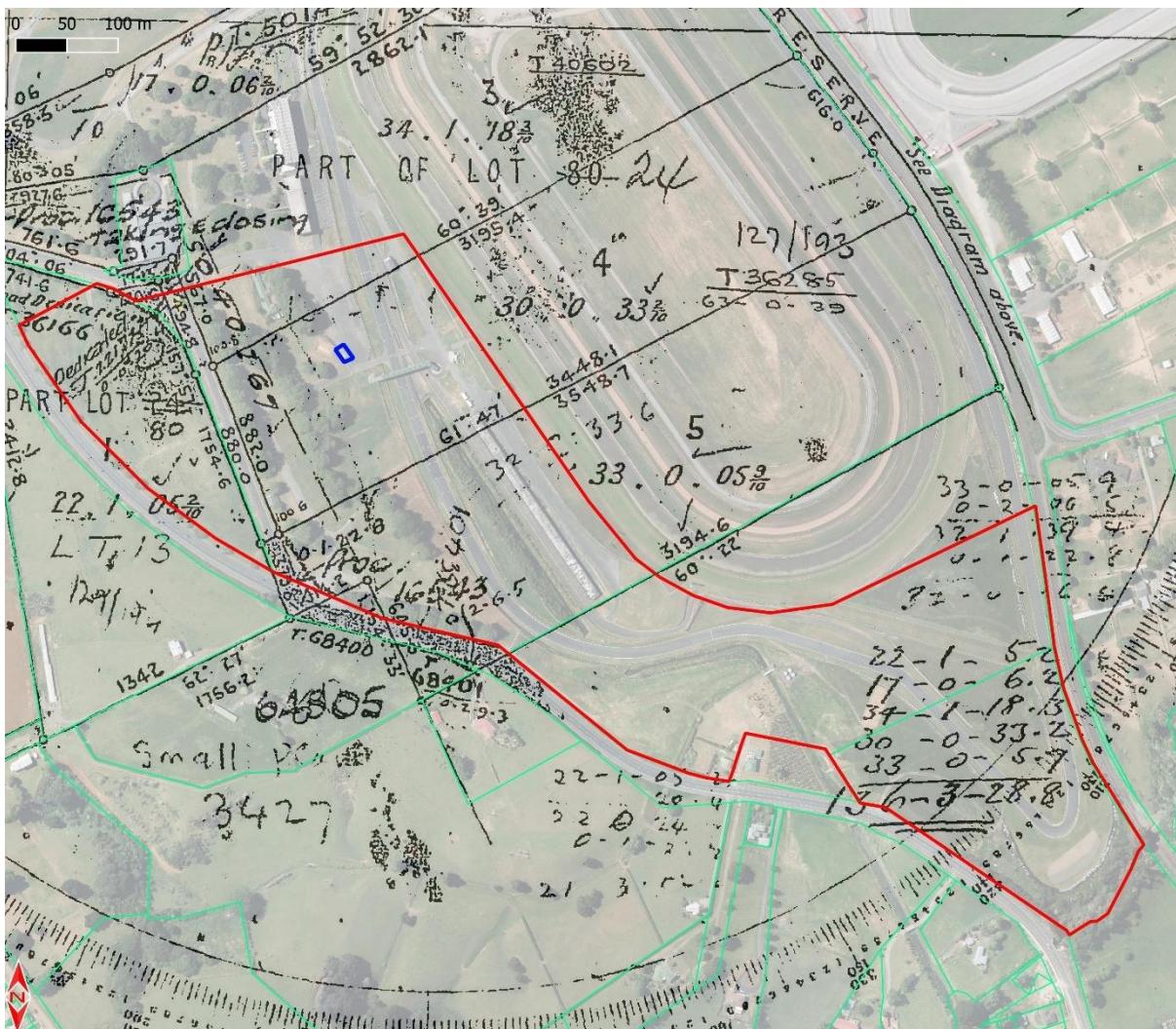


Figure 6: 1905 map (DP3363) showing the subdivision before the 'Franklin Racecourse'. Some of the fences between the paddocks are still visible in the earliest aerial of 1942. The study area is shown marked in red, also in the following figures.

The army camp to host US forces as part of the war effort, staging New Zealand for the war in the Pacific, was one of several camps in the Pukekohe region. It started in 1942, and the last troops were stationed there in 1944. It consisted mainly of small two men huts with some larger huts and administration buildings. Some of the existing buildings were leased from the Franklin Race Club. The lower part of the camp was later transformed into part of the motor racecourse going around the outside of the horse racecourse. It is possible that in some areas the remains of the camp are still in the ground undisturbed. Nonetheless as it is post 1900 it is

therefore not an archaeological site under the definition of the HNZPTA. But any remains might still carry historic values as described in the AUP:OP (Part 1, Chapter B: 5.2.2). These historic cultural values specifically mentioned knowledge based on using archaeological investigations methods which means values sub-surface.

The sequence of aerials since 1942 clearly show that large scale earthworks have taken place that will have largely destroyed any earlier remains, both from the pre-Contact period and the much later army camp.



Figure 7: The developing army camp in the 1942 aerial showing some of the small huts and larger buildings. The only building in the study area still standing today is marked in blue.



Figure 8: 1961 aerial. Grandstand building. Redevelopment of the slope towards the racetrack.



Figure 9: 1975 aerial. Development of the motor racing track. Impact onto the southern edge of the study area. Redevelopment of the drainage - further earthworks surrounding the drain. Possible flattening and reshaping the western edge of the study area - small natural drain was filled in (indicated by blue arrow).

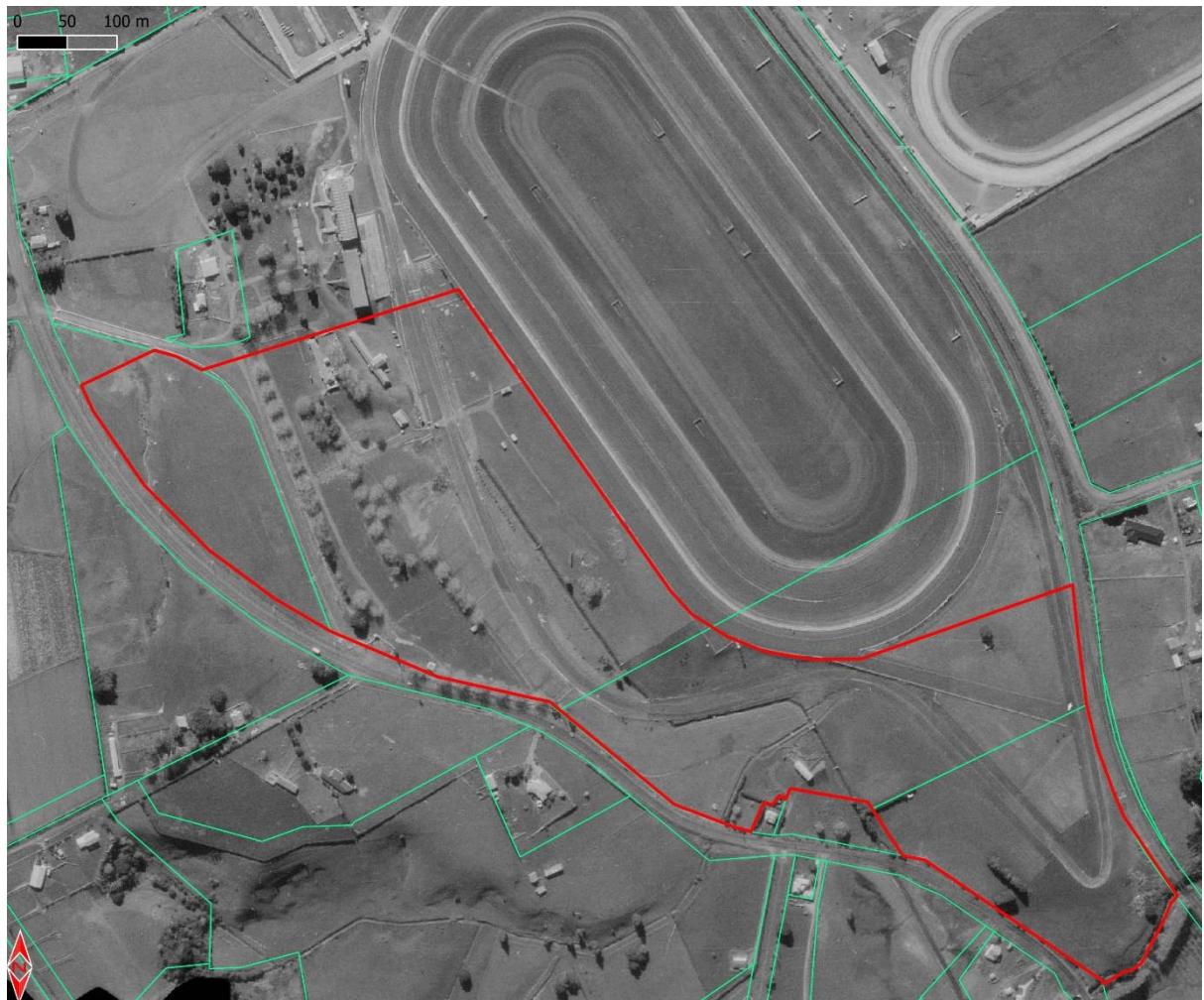


Figure 10: 1981 aerial. Further earthworks in the southern part of the study area. Deepening of the drainage channel.



Figure 11: Recent aerial (2017). Further earthworks in the southern part of the study area. Revegetation close to the stream. Further earthworks around the drainage channel.



Figure 12: View over the grandstand towards the pre 1940 brick building (photo taken during site visit August 2024).

Discussion

In a pre-Contact context, two issues have to be addressed: extensive māra kai (gardens) and wooden tools and taonga in undisturbed peat layers.

The area above the racecourse gently sloping up with northeasterly aspect could have been used for extensive gardens. The garden beds and made garden soils as well as small seasonal camp sites are usually recognisable in the archaeological record. These features are very ephemeral and easily destroyed by later earthworks. The earthworks shown in the aerials since the 1940s would indicate a low survival rate of such ephemeral features in the study area. Nonetheless, they cannot be completely dismissed as being destroyed.

The racecourse was originally a wetland, likely with some peat concentrations. Peat layers have been used in pre-Contact times to safekeep and maintain wooden tools and wooden carved taonga. The drainage of the wetland and ploughing or discing of the surface will have largely destroyed the ability of any peat to protect wooden artefacts from deterioration. Therefore, it is unlikely that any artefacts would have survived until now, but it cannot be completely dismissed.

This means that any pre-Contact features and artefacts are unlikely to still be present but a small risk of encountering them persists.

Under the AUP:OP and the Auckland Plan 2050 historic and cultural heritage post-1900 also have to be considered. There are two issues to consider: a pre-1940 building still standing, and the presence of sub-surface features of the army camp established in 1942 to house US troops before they continued into the War in the Pacific.

One brick building is from the early period of the horse racetrack pre 1940s within the study area. It could be considered as historic heritage under the AUP:OP, however it is not scheduled under the AUP:OP. I recommend a basic photographic documentation before any possible demolition to preserve any historic values through documentation.

The army camp of 1942 to 1944 is completely gone on the surface but in some areas undisturbed features and finds might be still subsurface. This has been alerted to by an Auckland Council report from 2017:

‘The Racecourse and Roosevelt Park remain as relatively open space areas today and the Sim Road and Helvetia camps are currently farmland, which to some degree assists in understanding the context in which these camps were situated. The occupation of these areas may have the potential to yield archaeological knowledge such as the outlines of former buildings or below ground artefacts associated with camp life during this short yet significant period in time.’ (Francesco, 2017)

Details of the camp have been described as follows:

“New Zealand troops occupied the Pukekohe Racecourse and Showgrounds as early as the winter of 1941. Up until April-May 1942, the men were all accommodated in canvas tents, but huts were then erected for the arrival of the American troops. The first of the New Zealand troops occupied the Pukekohe Racecourse until May 1942. The first American unit billeted at the racecourse was a battalion of the 145th Infantry Regiment, and the 37th Infantry Division between June and July 1942. They were followed by the 214th Anti-Aircraft Artillery Group (October-November 1942); elements of the 43rd Infantry Division (October 1942 to January 1943 and March to July 1943), the 3rd Marine Division (February to July 1943), and 25th Infantry Division (November 1943 to February 1944).

A plan for the racecourse shows that over 200 four-man low walled huts, 12 two-man huts, and several cookhouses, mess rooms, shower blocks, and a YMCA building were built on a large area of land between the racetrack and the Pukekohe-Buckland Road. Many of the Racing Club buildings from the time were also taken over, including the stables. The former Member’s Stand was used as the Officers’ mess and lounge. As well as the large hatted area, there were also sites set aside for tents. The Franklin Racing Club was paid £350 per year in rent for the occupation and use of their buildings and 60 acres of land. In 1943, there were 1,800 Marines in camp at the Racecourse.”(Francesco, 2017)

I recommend a relatively short and simple archaeological investigation over areas with high potential. Areas with high potential can be pinpointed using a geomagnetic archaeological survey. There are no surface indications of the camp left, therefore a non-intrusive, subsurface geomagnetic survey can answer the question where the best target areas for an archaeological excavation can be found. Three of four sampling areas will be sufficient to recover archaeological knowledge of the wider camp area.

10. Archaeological and Other Values

10.1. Assessment Criteria

“Archaeological values relate to the potential of a place to provide evidence of the history of New Zealand. This potential is framed within the existing body of archaeological knowledge, and current research questions and hypotheses about New Zealand’s past. An understanding of the overall archaeological resource is therefore required” (Heritage New Zealand Pouhere Taonga 2019:9).

The assessment criteria of archaeological sites are split into two sections: Main Archaeological values and Additional values. The criteria here are following the HNZPT criteria but have been re-arranged for clarity and separated into criteria within the site context and criteria between sites contexts.

The first archaeological values look at an *intra (within the) site context*.

- **Condition:**
How complete is the site? Are parts of it already damaged or destroyed?
Condition varies from undisturbed to destroyed and every variation in between. It is also possible that the condition of various parts of the site varies.
- **Rarity/Uniqueness:**
Rarity can be described in a local, regional and national context. Rarity can be rare as a site, or rarely examined or today a rare occurrence in the records.
- **Information Potential:**
How diverse are the features to be expected during an archaeological excavation on the site?
How complete is the set of features for the type of site?
Can the site inform about a specific period or specific function?

The second set of archaeological values use *inter site (between sites)* context criteria:

- **Archaeological landscape / contextual value:**
What is the context of the site within the surrounding archaeological sites?
The question here is the part the site plays within the surrounding known archaeological sites. A site might sit amongst similar surrounding sites without any specific features. Or a site might occupy a central position within the surrounding sites. Though a site can be part of a complete or near complete landscape, whereby the value of each individual site is governed by the value of the completeness of the archaeological landscape.
- **Amenity value:**
What is the context of the site within the physical landscape?
This question is linked to the one above, but focuses on the position of the site in the landscape. Is it a dominant site with many features still visible or is the position in the landscape ephemeral with little or no features visible? This question is also concerned with the amenity value of a site today and its potential for onsite education.

- **Cultural Association:**

What is the context of the site within known historic events or to people?

This is the question of known cultural association either by tangata whenua or other descendant groups. This question is also concerned with possible commemorative values of the site.

Other values could include (Heritage New Zealand Pouhere Taonga 2019:9):

- 1 Architectural
- 2 Historic
- 3 Scientific
- 4 Technological
- 5 Cultural

The last value, cultural, acknowledges if there is an impact onto Māori cultural values. This assessment will not evaluate these but rather state their relevance in relation to the other values. The HNZPTA requires an assessment of Māori values as part of archaeological authority applications. Generally, HNZPTA prefers that such an assessment be provided by tangata whenua (Heritage New Zealand Pouhere Taonga 2019:10).

In addition, the AUP:OP (Part 1, Chapter B: 5.2.2) outlines a place as having historic heritage value if it has one or more of the following values (the criteria of the AUP:OP focus more onto the historic heritage than the HNZPT criteria, but there is a fair amount of cross over between the two sets of criteria):

- (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 with an idea or early period of settlement within New Zealand, the region or locality;
- (b) **social:** the place has a strong or special association with, or is held in high esteem by, a particular community or cultural group for its symbolic, spiritual, commemorative, traditional or other cultural value;
- (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;
- (d) **knowledge:** the place has potential to provide knowledge through archaeological or other scientific or scholarly study, or to contribute to an understanding of the cultural or natural history of New Zealand, the region, or locality;
- (e) **technology:** the place demonstrates technical accomplishment, innovation or achievement in its structure, construction, components or use of materials;
- (f) **physical attributes:** the place is a notable or representative example of:

- (i) a type, design or style;
- (ii) a method of construction, craftsmanship or use of materials; or
- (iii) the work of a notable architect, designer, engineer or builder;

(g) **aesthetic:** the place is notable or distinctive for its aesthetic, visual, or landmark qualities;

(h) **context:** the place contributes to or is associated with a wider historical or cultural context, streetscape, townscape, landscape or setting.

10.2. Archaeological Values Assessment

There are no archaeological features observed or suspected in the study area, thus there are no archaeological values under the heritage legislation to be assessed.

Beyond archaeological values there are clearly cultural values within the study area and the wider area. Three Cultural Value Assessments have been provided:

- Ngāti Tamaoho, Cultural Values Assessment, Auckland Thoroughbred Racing, (Pukekohe Park)
- Ngāti Tamaoho Cultural Values Assessment, Ngā Kōrero Tuku Iho – Traditional History Addendum, Auckland Thoroughbred Racing, (Pukekohe Park Raceway)
- DRAFT NGAATI TE ATA WAIOSHUA, CULTURAL VALUES ASSESSMENT: PUKEKOHE PARK PRIVATE PLAN CHANGE, prepared for Auckland Thoroughbred Racing, Rev.1 November 2024

10.3. Historic Heritage Significance Assessment

The values considered here are the ones used for cultural heritage in the AUP:OP (B5.2.2) for the pre-1940 building.

Table 1: Historic Heritage values for the pre 1940 brick building, AUP:OP

Sites	Value	Assessment
Pre 1940 brick building	historical	The building was likely a store room for the Franklin Racing Club built sometime in the 1930s.
	social	The building is part of the history of horse racing in Pukekohe.
	Mana Whenua	At the time mana whenua were segregated from European settlers in Pukekohe and had little if any input to the Franklin Racing Club.

Sites	Value	Assessment
	knowledge	It's a basic utilitarian building which can provide little if any knowledge to its use other than storage.
	technology	No particular technological values.
	aesthetic	It's a rectangular brick building with a simple roof. There is little aesthetic value.
	context	It is part of the early history of the Franklin Racing Club.
	Physical attributes	The brick building is an example of a well built storage building, but is not a notable example.

The values considered in the next table are the ones used for cultural heritage in the AUP:OP (B5.2.2) for the Army Camp.

Table 2: Historic Heritage values for Army Camp, AUP:OP

Sites	Value	Assessment
Army Camp 1942 - 44	historical	The army camp is part of New Zealand supporting the war effort in the Pacific theatre by hosting US troops in preparation for them fighting in the Pacific.
	social	The presence of US troops has changed social attitudes and expectation.
	Mana Whenua	Mana whenua were segregated at the time from the Europeans living in Pukekohe and had likely no part in planning the camp, but probably provided the majority of the labour force building it. The segregation will have been familiar to some of the US troops.
	knowledge	It is an opportunity to gain insight into the day to day life of the troops through archaeological investigation. It is unlikely that other historic sources would mention the details archaeological research can provide.
	technology	No particular technological values.
	aesthetic	All remains are subsurface and have no aesthetic value.

Sites	Value	Assessment
	context	The camp is part of the war effort which was a defining moment in New Zealand's history.
	Physical attributes	If there are any physical remains, they will be subsurface and ephemeral. Any remains will be typical for these types of camps and not notable.

The above assessment does not show sufficient historic significance to be scheduled. It should be noted that the schedules of the Auckland Council are reviewed periodically and not all historic sites that could warrant scheduling have been scheduled.

Nonetheless, any subsurface remains of the Army Camp have still some historic value, especially in terms of the potential to add to our knowledge of the history of New Zealand.

11. Assessment of Effects

11.1. Effects

The assessment of effects follows the basic guidelines for preparing an assessment of environmental effects that includes a discussion on the nature of environmental effects (Ministry for the Environment 1999). It should be remembered that an archaeological excavation of a site mitigates only the loss of archaeological information but not the loss of the site and its contextual, cultural and educational values (NZHPT 2006).

The following effects must be considered:

- how much of the site will be affected
- if the future risk of damage is increased
- whether a design change may avoid adverse effects on the site(s)

The impact through any development will be unknown as no archaeological sites were recorded previously or as part of this assessment., but it is very unlikely that any pre 1900 features, finds, layers or deposits will be present in the study area.

The small risk can be mitigated (see next chapter).

The small brick building is not scheduled under the AUP:OP and is not a notable example of a 20th century brick storage building. The demolition of the building would impact only on low heritage values and their loss can be mitigated.

The possible remains of the 1942 army camps and the effects of any development inside the study area are assessed against historic heritage values. Although this site is not scheduled under the AUP:OP:

- a) Any surviving features of the camp are subsurface, and the ADP of the AUP:OP for post 1900 features will mitigate the risk encountering such features. Furthermore, these features will be very repetitive as the main features of the camp were small temporary huts. Therefore, it is possible to sample areas with a high survival rate, identified through geophysical survey, which will be sufficient, instead of investigating the entire camp area. Standard archaeological documentation, analysis and reporting will be applied to these features.
- b) The fabric of the place is made up from sub-surface, ephemeral features. There is little value in keeping these ephemeral features, especially if a sampling investigation would have taken place.
- c) The proposed development will have no adverse impact on the ability to interpret the camp and any sampling investigation will enhance the ability to interpret the camp.
- d) There is no adverse effect on the significance of the site. Any excavated features will enhance the interpretation and the significance of the place.
- e) The sampling areas features will be recorded, analysed and reporting using modern archaeological methods and practices.
- f) Accommodation of people through a residential development relates to the historic use as a camp site.

Overall the development has little adverse impacts onto the heritage values of the site. Best practice recommendations are identified below. It is likely that any new features that are revealed will enhance our ability to understand and present the history of the site to the wider public.

11.2. Site Management & Mitigation

Possible methods to protect sites, and avoid, minimize or mitigate adverse effects will be discussed.

We propose here a pro-active approach to the remaining historic heritage values of the study area, rather than a reactive approach. Any historic heritage features would be investigated and documented before the earthworks for the development and therefore any risk of delaying these earthworks is largely minimised. Furthermore, any historic information is collected in a systematic way using best archaeological practice.

The recording of the pre-1940 brick building is not a requirement under the AUP:OP as it is not scheduled. It is recommended to document the building to Level III (Heritage NZ 2018 – Guidelines) through photos including photogrammetry of all four sides and low aerial photogrammetry for topdown and roofline. The documentation should be held in Auckland Council archives. This documentation would mitigate the loss of the building through any future developments. This allows to engage in the development that might or might not included the demolition of the building.

The following best practice process to manage the risk of uncovering unrecorded archaeological features at the time of future earthworks and development is recommended:

- **Archaeological induction** of all contractors.
- **Spot Monitoring** of initial earthworks and support cultural monitors if present.
- For the army camp, focus on the area that had the least impact by earthworks since 1944. Use a geomagnetic survey (fluxgate gradiometer) to pinpoint areas of high feature density. Choose about **three areas for excavation each 10m x 10m**. Sample, record, analyse and date any archaeological features using standard archaeological methods. Interpret the results.
- Record the pre 1940 brick building to **Level III** (Heritage NZ Pouhere Taonga Guidelines) through photos including photogrammetry of all four sides and low aerial photogrammetry for topdown and roofline.
- If substantial remains are found, interpret the results and display them using modern dissemination methods in a publicly accessible space along the final constructed development. It could also include interpretation resources for local schools (“Sense of place”, “Place-making”).

12. Conclusions & Recommendations

No archaeological sites were previously recorded or discovered during the survey. There is a small risk of encountering archaeological features, finds, layers or deposits that have escaped the earthworks during the 20th century. These can be mitigated through using the ADP in the AUP:OP.

A building from the first half of the 20th century and the subsurface remains of the Army Camp from 1942 to 1944 have limited historic heritage values. Mitigations for their loss are proposed. None of these two features warrant scheduling under the AUP:OP but they both have some historic heritage values.

Leaving it to the ADP of the AUP:OP to deal with any remaining historic heritage values can leave the development at the risk of delays. It is therefore recommended that the remaining historic heritage values are dealt with in a pro-active manner at the time of future earthworks and development (Pro-active mitigation in *cursive* in the below list).

It is recommended to discuss with mana whenua tikanga for the works, cultural finds (taonga tuturu) and koiwi. This is best done via an agreed Cultural Management Plan that details the above but also cultural inductions, cultural monitoring, etc. and that is available to the earth working and construction crews on site.

It is recommended that the Accidental Discovery Protocols (ADP) as provided in the Unitary Plan are highlighted for all Earthworking Crews.

It is recommended to undertake the following steps prior to the commencement of any land disturbance on site:

1. Induct all subcontractors before the enabling earthworks.
2. Spot monitoring of all initial earthworks, following best practice processes at consenting stage, including for example:
 3. *Suggest sample excavations of up to three small areas of the army camp site.*
 4. *Level III documentation of the brick building.*
 5. *Reporting on the results*
6. Any new information gleaned from the excavation and monitoring could be used to develop interpretation signage within the carpark for users and pedestrians to enhance the amenity and aesthetics.

13. Acknowledgments

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