

BEFORE THE BOARD OF INQUIRY

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under s146 of the Resource Management Act 1991 to consider an application by Mighty River Power Limited for resource consents to construct, operate, and maintain a wind farm at Turitea

SUPPLEMENTARY EVIDENCE OF RODNEY CLOUGH

Response to Section 42A report by Susan Forbes

1. I have reviewed the section 42A report prepared by Kotuku Consultancy Ltd (Susan Forbes) 'Turitea Wind Farm Board of Inquiry: Assessment of Cultural Effects', and comment on relevant matters from that Report as follows.

Archaeological sites

2. Susan Forbes refers specifically to archaeological issues covered in my evidence in her paragraphs 32 to 37. In paragraph 34, she appears to take issue with my view that historic tracks in the area, specifically the Kairanga track, do not constitute archaeological sites. She states that tracks through Paeroa Tararua are important heritage landscape features and that their archaeological value should have been considered. In my assessment I did give consideration to the archaeological value of these and other features, but can only reiterate that archaeological value must be based on physical remains. For example I am aware that the current Pahiatua - Aokautere road was historically a Maori route or track through the hills, but construction of the road would have removed all archaeological remains of this former track. Even though its historical significance is retained, it has no archaeological values.

Accidental Discovery Protocols

3. In her paragraph 37 Ms Forbes suggests that while accidental discovery protocols are sound in theory she supports iwi representation (monitoring) during earthworks, complemented by pre works briefing of all site contractors on the detection of archaeological remains. In addition to the mitigation measures outlined in my AEE report and evidence, I would support this approach which would be in accordance with my previous recommendations, and in the conditions now agreed between Tanenuiarangi Manawatu Incorporated (TMI) and Mighty River Power.

Historic Heritage Approach

4. In paragraph 35 Ms Forbes suggests that my assessment did not consider a heritage landscape approach and implies that that I would have reached a different conclusion had I done so. From the outset I have been aware of and have referred to the significance of the Tararua Ranges and particular places in the Tararua Ranges to iwi. I am familiar with

the New Zealand Historic Places Trust (NZHPT) National Research Framework Discussion Paper referred to by Ms Forbes, and also with the NZHPT's Heritage Landscape Values Discussion Paper,¹ which relates more specifically to historic heritage landscape assessment (I am part of the Cultural Heritage Landscape Group that provided comment on the latter document in its draft stages). However, it is clear in the paragraph quoted by Ms Forbes that the NZHPT is referring to evaluation of archaeological sites in their landscape context, and this approach in general is best applied when there are significant archaeological remains in that landscape. I recognise that '*archaeological sites do not exist in isolation and may be part of complex cultural landscapes [and that] ... landscape studies and settlement pattern analysis are vital to gaining a better appreciation for [of] the way people shape and use that landscape*', as this has always been fundamental to archaeological assessment. However, this is not a landscape that has been shaped or used intensively and I would conclude that although the Turitea Reserve and project area are part of a broader historic heritage landscape, it is not a complex cultural landscape and certainly not an archaeological landscape of any significance.

5. Historic heritage landscape assessments under the RMA should in the first instance be considered in relation to the definition of historic heritage in Section 2 of the Act. In accordance with that definition, historic heritage:

a) *Means those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures deriving from any of the following qualities:*

- i. *Archaeological*
- ii. *Architectural*
- iii. *Cultural*
- iv. *Historic*
- v. *Scientific*
- vi. *Technological*

b) *Includes*

- i. *Historic sites, structures, places, and areas; and*

¹ NZHPT, Sustainable Management of Historic Heritage. Discussion Paper No. 3. Heritage Landscape Values. August 2007.

- ii. archaeological sites; and*
- iii. Sites of significance to Maori , including wahi tapu; and*
- iv. Surroundings associated with the natural and physical resources*

6. If we consider the landscape of the project area in this light, the archaeological values are low, there are no architectural values, historic values are limited, as are scientific and technological values. Although cultural values are significant, the bulk of the cultural sites identified by Rangitaane are concentrated elsewhere.
7. Once a historic heritage landscape has been defined and evaluated, the issue is still what effects the land use proposal will have on that landscape. Potential effects on historic heritage landscapes fall into three broad categories: physical, visual and conceptual.
8. In terms of physical effects, there will be no effects on known archaeological or other historic heritage sites that would contribute to the historic heritage landscape.
9. Visually, the proposal will have no significant effects on archaeological sites or the archaeological landscape, and will not prevent the history of the landscape being 'read' and understood. In terms of broader visual effects on the landscape, I note that in response to concerns raised by iwi over the placement of some turbines, particularly turbine zone 0055 near Tirohanga, Mighty River Power has deleted this turbine because of its physical proximity to a peak of significance to Rangitaane.
10. Conceptual effects are much more difficult to determine or quantify, as they relate to intangible values such as the history of a place and its cultural significance. I do not consider it appropriate for the archaeologist to attempt to assess effects on cultural values. This should be carried out by the tangata whenua. The supplementary evidence of Mr Henry describes the cultural assessments that have been provided by the various iwi groups and the responses to any matters raised. I would therefore conclude that iwi do not consider their cultural values will be overly compromised provided that their concerns are addressed.
11. In terms of other intangible values, I would only note that the project will have no effects on the known history of the area, or our ability to appreciate that history with reference to the landscape.

Conclusion

12. Overall, while I have always recognised that the project area is part of a larger historic heritage landscape of significance to the tangata whenua, a reconsideration of historic heritage landscape issues has not led me to change my opinion that the effects of the proposal on the archaeological landscape are less than minor. Nor do I consider that the effects on the broader historic heritage landscape will be more than minor.

Rod Clough

20 July 2009