

**BEFORE A HEARING PANEL
CONSTITUTED BY NELSON CITY COUNCIL**

IN THE MATTER

of an application by **CCKV Maitahi Development Co LP** and **Bayview Nelson Limited** for a change to the Nelson Resource Management Plan (Plan Change 28)

IN THE MATTER

of Part 5 and Schedule 1 of the Resource Management Act 1991

STATEMENT OF EVIDENCE OF AMANDA YOUNG

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Section A – Introduction and Scope of Evidence

Name, qualifications and experience

- [1] Amanda Young, MA (Hons) in Anthropology, sub-discipline Archaeology. BA in Anthropology and History.
- [2] S45 approved archaeologist under the *Heritage New Zealand Pouhere Taonga Act 2014*. Member of New Zealand Archaeological Association, Nelson Historical Society and Australasian Society for Historical Archaeology.
- [3] I am an archaeological consultant. I have been a professional archaeologist since graduating from the University of Auckland in 1992.
- [4] I have had my own archaeological consultancy since 1995.
- [5] I have also worked as an archaeologist for an environmental consultancy. I spent four years with Heritage NZ (then NZ Historic Places Trust) as Regional Archaeologist and Applications Co-ordinator. I have been employed by the Auckland Regional Council and Manukau City Council to provide specialist archaeological and cultural heritage advice.
- [6] I moved to Nelson in 2000 and for the last 22 years I have been providing archaeological expertise to a variety of clients in Te 'Tau Ihu. These include territorial authorities, forestry companies, planning firms and private individuals and companies.
- [7] My consultancy work is primarily concerned with the identification, assessment and mitigation of adverse effects under the *Heritage New Zealand Pouhere Taonga Act 2014* and the *Resource Management Act 1991*. This involves undertaking historical research; iwi consultation; site surveys and field assessments; assessments of heritage values; report writing; advice on legal requirements; applications; overseeing the fulfilment of legal conditions; mitigation investigations, excavations and monitoring; and any other required archaeological and historical work.

- [8] I am familiar with the archaeological, historical and cultural landscape of Nelson including the Maitahi / Mahitahi Valley. I have carried out a number of archaeological and historical assessments in the area.
- [9] I do not have heritage building conservation or architectural expertise but am guided by others on those matters.

Expert Code

- [10] While this is not an Environment Court hearing I have met the standards in that Court for giving expert evidence.
- [11] I have read the Code of Conduct for expert witnesses issued as part of the Environment Court Practice Note 2014 (Part 7). I agree to comply with the Code of Conduct. I am satisfied that the matters addressed in this statement of evidence are within my expertise. I am not aware of any material facts that have either been omitted or might alter or detract from the opinions expressed in this statement of evidence.

Role in Project

- [12] I was engaged to provide a broad overview of the potential archaeological and historical values of the subject land in mid-2020. The assessment included historical research, site visits and remote interviews with members of the Richardson family. It resulted in the report “Private Plan Change Request Historical and Archaeological Assessment” 17 December 2020.
- [13] As a result of the commissioning of Robin Miller to provide specific advice on selected heritage structures (the shearing shed / hop kiln and concrete chimney), I wrote a joint addendum with Mr Miller “Maitahi Valley Farm Buildings, 7 Ralphine Way, Maitai Valley, Nelson. Addendum Report.” 11 May 2022. This refined and corrected some assumptions made in my initial report of December 2020.
- [14] I participated in an expert conference on 16 May 2022 resulting in a joint witness statement. I confirm my agreement with the contents.

Scope of Evidence

- [15] The purpose of this evidence is not to restate matters that are already contained in reports or that have not been identified as controversial following expert conferencing. Rather it is to address significant matters in contention arising from submissions or any matters of disagreement between experts.

Section B – Executive Summary

- [16] My assessment of 17 December 2020 was an initial assessment of archaeological and historical values. It did not consider places or issues of significance to Māori besides these. I was not required to provide a detailed examination of historic buildings and structures.
- [17] There are no recorded archaeological sites on the subject property, nor any places listed on the New Zealand List.
- [18] One site of cultural significance, Kāka Hill lookout and waahi tapu (MS57) is recorded in Appendix 3 of the Nelson Resource Management Plan [NRMP]. This records the burial place of Ngāti Kuia Tupuna Whiro.
- [19] A kāinga / pa (MS58), again associated with Ngāti Kuia, is recorded on the opposite side of the Maitahi / Mahitahi to the subject property.
- [20] My history of the property was confined to providing a background to the human activity on the land (actual and potential) concentrating on those aspects that would result in any physical evidence being present. This relates to the definition of an archaeological site in the *Heritage NZ Pouhere Taonga Act 2014*.
- [21] The Maitahi / Mahitahi Valley was an important place for pre-European and historic period Māori. It was used as an ara as well as a rich food and resource gathering area. There would have been small cultivations and kāinga along the river banks. The subject property would have been part of this activity.

- [22] I concluded that physical evidence of these activities within the property, although possible, would be sparse and in most areas unlikely.
- [23] Any archaeological evidence relating to Māori occupation and use would most likely be in the form of find spots of taonga although evidence such as middens, ovens, terraces and other occupation evidence could not be ruled out.
- [24] Any archaeological evidence of Māori occupation and use would have archaeological and cultural value.
- [25] I inspected the site of MS57 as shown in the NRMP. No archaeological evidence was visible in that vicinity. I raised the possibility that the location was incorrect, and that Ngāti Kuia needed to determine this.
- [26] From approximately 1842 to 1969 the property was part of the Maitai Run owned by the Richardson family.
- [27] I identified a number of buildings and structures on the property relating to this period of history including the site of the original farm house, Edendale (ca.1842); a chimney associated with Edendale; a shearing shed which is said by the family to have incorporated a hop kiln; various yards and outbuildings; and the twentieth century farm managers house.
- [28] I concluded that buildings, structures and sites relating to the Maitai Run and the Richardson family had historical and archaeological significance; landscape, technological, cultural and rarity values; and community esteem.
- [29] Subsequent to my preliminary assessment, in 2021 and 2022 I participated in number of discussions with Mr Miller regarding the specific heritage values of the shearing shed / hop kiln and standing chimney. I had the opportunity to read his memorandum of 6 April 2022.
- [30] As a result of these discussions I jointly wrote the 11 May 2022 Addendum with Mr Miller.

- [31] Based on Mr Millers expertise, I revised my opinion of the technological value of the shearing shed / hop kiln and the practicalities of some of my original mitigation proposals.
- [32] I also revised my opinion of the archaeological and technological value of the chimney as Mr Miller has confirmed that this is a twentieth century structure.

Section C – Evidence

- [33] A copy of the two reports mentioned above are attached to this statement, and forms the body of my evidence and conclusions.
- [34] In addition, I understand that Ngāti Kuia have determined the location of MS57, the lookout and waahi tapu, to be not at the location shown on the NRMP.
- [35] I further understand that no other sites of significance to Māori that have an archaeological component have been raised during the submission process or during consultation with iwi.
- [36] Since the preparation of my 2020 report and the 2022 Addendum, I have carried out further archival research in an attempt to clarify the date of the shearing shed and verify the presence of a hop kiln.
- [37] Unfortunately these issues have still not been determined with any certainty.
- [38] Historic rating records, one of the more reliable sources of building information, are apparently no longer in existence for the property. The Richardson family information, although very helpful, has no precise dates.
- [39] I accept the Richardson family's assertions that the shearing shed incorporates part of an earlier hop kiln, perhaps the hop storage area adjacent to the actual kiln.
- [40] I believe that it is most likely that the shearing shed / hop kiln structure dates from the second half of the nineteenth century. There were hops

being grown in the Maitahi / Mahitahi Valley from at least the 1870s and on the Maitai Run from at least 1897.

[41] I am not aware of any specific matters contained in submissions or evidence that I need to address.

Dated 13 June 2022

A handwritten signature in black ink, appearing to read 'A Young', written over a horizontal line.

[Amanda Young]