

**BEFORE THE INDEPENDENT PANEL
OF KAPITI COAST DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991 ("RMA")

AND

IN THE MATTER of Private Plan Change 4 ("PC4") to the Kāpiti Coast District Plan ("Plan") - 65 and 73 Ratanui Road, Otaihanga

**STATEMENT OF EVIDENCE OF ELLEN ANN CAMERON ON BEHALF OF
WELHOM DEVELOPMENTS LIMITED**

(ARCHAEOLOGY)

16 JANUARY 2026

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1. INTRODUCTION

- 1.1 My full name is Ellen Ann Cameron. I have been a Director at Clough & Associates since 2022. Previously I was a Senior Archaeologist at Clough & Associates from 2014.
- 1.2 I hold a Master of Science Degree in Environmental Archaeology and Palaeoeconomy from the University of Sheffield (1991). I am also a member of the New Zealand Archaeological Association ("NZAA").

Qualifications and experience

- 1.3 I have 30 years' experience in cultural heritage management. I specialise in the field of archaeology including research, survey, excavation, analysis and report preparation, initially in Asia, and have worked full time in New Zealand carrying out assessment of effects for development and infrastructure projects since 2014.

Involvement in Welhom Developments Limited plan change request

- 1.4 Clough & Associates was instructed by Welhom Developments Limited in March 2023 to prepare an archaeological report for Due Diligence¹ and in May 2024 to prepare an Archaeological Assessment for PC4² which seeks to rezone the properties at 65 and 73 Ratanui Road ("Plan Change Area") from Rural Lifestyle Zone to General Residential Zone under the Plan. I am familiar with the area to which the application relates, and visited the site on 2 March 2023 and 20 November 2024.
- 1.5 I confirm I am the author of the Due Diligence archaeological report (March 2023) and the Archaeological Assessment report for the proposed private Plan Change at 65 and 73 Ratanui Road, Paraparaumu (November 2024).

Code of Conduct

- 1.6 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and will continue to comply with it while giving oral evidence before the Hearing Commissioners. Except where I state

¹ Cameron, E. March 2023. 65 Ratanui Road, Paraparaumu: Due Diligence Report. Clough & Associates report prepared for Welhom Developments Ltd.

² Cameron, E. November 2024. 65 and 73 Ratanui Road, Paraparaumu, Proposed Private Plan Change: Archaeological Assessment.

that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

2. SUMMARY OF EVIDENCE

- 2.1 No recorded archaeological sites were identified during the background research undertaken for the archaeological reports in March 2023 and November 2024 and none were identified during the field surveys.
- 2.2 I identified that the PC4 area in the archaeological reports has archaeological potential, particularly in the elevated dunes at the back (northern) boundary, which may contain archaeological remains such as shell midden / oven, which could not be identified during the survey due to thick vegetation. I also noted that based on the information contained on early survey plans parts of the Plan Change Area were likely swamplier in the past and the presence of isolated artefact finds associated with Māori occupation and settlement, which are sometimes located in wetland environments may be present.
- 2.3 Based on the archaeological potential of the Plan Change Area, I recommended that once detailed plans for future development have been prepared a detailed archaeological assessment should be prepared to determine if future development is likely to affect archaeological values and to recommend mitigation measures if appropriate, as part of the archaeological approvals process under the Heritage New Zealand Pouhere Taonga Act 2014.

3. SCOPE OF EVIDENCE

- 3.1 This statement of evidence will:
 - (a) provide a brief summary of the archaeological context of the proposed plan change;
 - (b) summarise the key findings and recommendations from the Archaeological Assessment;
 - (c) respond to the Council Officer's Section 42A report; and
 - (d) respond to the submissions received.

4. ARCHAEOLOGICAL CONTEXT

4.1 I noted in my archaeological assessment report that the Plan Change Area is situated in a broader archaeological landscape that runs along the Kāpiti dune belt and that the Paraparaumu area contains a number of archaeological sites associated with Māori settlement and occupation, especially in the form of shell middens and ovens.³ I also noted that the relatively unmodified nature of parts of the PC4 area indicate the possibility of this site type to be present, especially in the elevated dunes along the northern boundary and that isolated artefact finds could be present in areas that were formerly swampy land in the southern part of the PC4 area.

5. KEY FINDINGS AND RECOMMENDATIONS

5.1 The archaeological assessment was informed by background research and field survey. The background research included a search of the NZAA site record files, District Plan Schedules, early maps and plans held at Land Information New Zealand ("LINZ"), historic government records, newspaper articles and reports from archaeological assessments previously undertaken in the general area. No recorded archaeological sites were identified in the Plan Change Area during the background research.

5.2 I carried out two field surveys of the Plan Change Area, the first for 65 Ratanui Road on 2 March 2023 and the second for 73 Ratanui Road on 20 November 2024. No archaeological sites were identified during the surveys.

5.3 Based on the findings of the Archaeological Assessment and surveys, I confirm that no archaeological sites are currently recorded in the Plan Change Area. However, based on the recorded archaeological sites in the surrounding area and the landform of relatively unmodified dune ridges and former swampy ground in parts of the Plan Change Area, it is my opinion that the Plan Change Area has potential to contain unrecorded subsurface archaeological sites associated with Māori occupation and settlement in the form of shell midden and oven features, particularly in the elevated dunes along the northern boundary and also possibly isolated artefact finds in the former swampy land in the southern part of the Plan Change Area.

5.4 Based on the findings of the archaeological assessment report for the proposed Plan Change, I have recommended that once detailed design has been undertaken and the final layout and earthworks plans for the proposed

³ Cameron, E. November 2024. 65 and 73 Ratanui Road, Paraparaumu, Proposed Private Plan Change: Archaeological Assessment at p 33.

residential development have been prepared, further detailed archaeological assessment should be carried out to determine if future development is likely to affect archaeological values and to recommend mitigation measures if appropriate, as part of the archaeological approvals process under the Heritage New Zealand Pouhere Taonga Act 2014.

6. RESPONSE TO SUBMISSIONS AND S42A REPORT

- 6.1 One submission has been received that refers to archaeological matters from Alan Francis Kelly (Submitter No. 11). This submission is in reference to the potential for unrecorded archaeological remains to be present in the Plan Change Area, particularly in the large sand dunes in the northern part of 65 Ratanui Road.
- 6.2 If any unrecorded sites are present appropriate mitigation would be recommended in accordance with the requirements of the Heritage New Zealand Pouhere Taonga Act 2014. If planting is proposed, this would include a requirement that shallow rooted species are planted in areas where archaeological remains are identified.
- 6.3 No archaeological matters have been raised in the Section 42A Report.

7. CONCLUSION

- 7.1 Future development enabled by Plan Change Area will not affect any known archaeological sites but does have the potential to affect currently unrecorded subsurface remains associated with Māori occupation and settlement, most likely in the form of shell midden and ovens and possibly isolated artefact finds.
- 7.2 In conclusion, I consider that further detailed assessment and provision of appropriate mitigation (if required), at a later stage of the development will provide adequate management of any unrecorded archaeological sites that may be present.