

**BEFORE THE HEARING PANEL
APPOINTED BY KAPITI COAST DISTRICT COUNCIL**

IN THE MATTER OF | I TE TAKE O the Resource Management Act 1991
AND | ME

IN THE MATTER OF | I TE TAKE O Proposed Plan Change 5 (Private):
100 and 110 Te Moana Road,
Waikanae, Kāpiti Coast District

**STATEMENT OF EVIDENCE OF
MARY O'KEEFFE
ON BEHALF OF ERIC, VINCE AND RAECHEL OSBORNE**

Dated 2 September 2026

Introduction

1. My full name is Mary Patricia O'Keeffe.
2. I have prepared this Statement of Evidence regarding Private Plan Change 5 (PC5) to the Kapiti Coast District Plan, in relation to archaeological matters.

Qualifications and experience

3. I am an independent self-employed consultant archaeologist through my consultancy Heritage Solutions. I established Heritage Solutions in 1997. I have a Bachelor's and Master's degree in Anthropology. I have previously worked for the Department of Conservation, and Historic Places Trust (now Heritage New Zealand Pouhere Taonga). I am the Central Filekeeper for the NZ Archaeological Association's on-line database of recorded archaeological sites, ArchSite. I am the secretary of ICOMOS Aotearoa New Zealand. In my ICOMOS capacity I have undertaken expert mission assessments for proposed inscription of World Heritage sites for UNESCO. I am a member of the NZ Archaeological Association, and Patron of the Maritime Archaeological Association of New Zealand.

Code of Conduct

4. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

Summary of work completed

5. I prepared the report contained in a memo to Susan Jones of Mitchell Daysh, dated 1 August 2024, entitled "Proposed Osborne plan change, Waikanae" (**Archaeology Report**).
6. The methodology used, supporting data, and conclusions reached are all as set out in that report.
7. I **adopt** the Archaeology Report as my opinion for the purpose of this hearing.

Summary of opinion

8. For convenience, I summarise the conclusions and main findings from the Archaeology Report as follows.

9. The archaeological assessment in the report was based on supporting data sourced from historic survey plans, data on already recorded archaeological sites, geomorphological data such as soils and landform types, and a site visit.
10. A key source of data is the archaeological programme undertaken by me for the construction of the MacKays to Peka Peka Expressway (**M2PP**), which is adjacent to the subject property. A predictive model of archaeological site probability on the Kapiti dunes was developed on the basis of the M2PP archaeological programme. The elements of this predictive model are set out in section 3.3 of the Archaeology Report.
11. A key aspect of the archaeology of the Kapiti Coast is the strong functional relationship between the environment and the archaeological resource. Archaeological data on site type, size, and location obtained from the M2PP project shows that sites are largely located on the dunes, beside areas of formerly navigable wetlands.
12. The Osborne land parcel is within the band of high rolling sand dunes north of the Waikanae River and adjacent to a previously navigable waterway, being a typical location for sites to occur as established by the M2PP archaeological programme. Also of note is the fact that the largest sites recorded in the M2PP archaeological programme, and the sites with the greatest faunal diversity recorded in the programme, were located in the parabolic dunes north of the Waikanae River.
13. One site has been recorded within the Osborne parcel, being a shell midden, and possible terrace. Further sites, being middens and ovens, are located in the vicinity of the subject land parcel, as shown in Figure 8 of the Archaeology Report (copied below).



Figure 1 from Archaeological report: Recorded sites within and near subject parcel

Subject parcel shown as red outline
 Archaeological sites shown as red dots
 Archaeological data sourced from ArchSite
 Georeferenced by author

14. I also note the subject parcel is adjacent to the Takamore wahi tapu, which is listed on the Kapiti Coast District Council District plan (Schedule 9, W1), and is included in Heritage New Zealand's Heritage List Rarangi Korero as a Wahi Tapu Area (list no 7263). Whilst the wahi tapu area contains recorded archaeological sites, it was listed primarily for its cultural and intangible values.
15. I made a site visit to the subject parcel on 24 July 2024. Site R26/367 was viewed as a scatter of shell on the dune surface within an area of about 2 metres in extent.
16. On the basis of the nature of the physical dune on the subject parcel, its geomorphology, and information extrapolated from the predictive model, I conclude that there is a reasonable probability of further unknown and unrecorded sites being present.
17. Any such sites would most likely be shell middens and ovens. The potential for burials is always present on the Kapiti Coast, so must be accounted for, but this is a relatively low possibility.

18. Such sites are not likely, by their probable nature, size and constituent species present, to be any more than of local significance.

Conclusions

19. There is no reason, on archaeological grounds, why the proposed plan change should not proceed.
20. Prior to earthworks being undertaken that arise from the plan change, the developer should seek an archaeological authority from Heritage New Zealand Pouhere Taonga in terms of Part 3 of the Heritage New Zealand Pouhere Taonga Act 2014.
21. Conditions in this authority are likely to direct work to investigate known sites and to locate and investigate unrecorded sites, prior to bulk earthworks. Conditions are also likely to include a requirement to analyse shell middens and other sites recorded. Production of a final report on work and analysis is a typical condition of an authority.
22. A site instruction will guide detail of such archaeological works.
23. The requirement for an authority, and the conditions in it, is a standard response from Heritage New Zealand Pouhere Taonga for projects of this type and relative archaeological significance.

Mary O’Keeffe

2 September 2026