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23 July 2025

Theresa Burkhardt

Senior Policy Planner – District Plan

Far North District Council

Tēnā koe Theresa,

**Re: Archaeological Review of Muriwhenua Incorporated Submission**

This report provides a review of the document presented proposing a Māori Purpose Rural and Māori Purpose Rural Settlement Zones on Muriwhenua Incorporated lands. The purpose of the review is to provide advice to Far North District Council (FNDC) staff on the following matters:

- Does the reviewer support the summary of results and the recommendations?
- Is further archaeological study appropriate and what form would that take?
- Are there archaeological matters that mean that re-zoning is inappropriate?

**1. Reviewer Qualifications and Experience**

I hold advanced degrees in archaeology from University College London, UK (PhD) and the University of Otago (MA). I have over fifteen years archaeological experience in New Zealand and have also worked in both commercial and research archaeology in Australia and the United Kingdom. This includes experience working in Northland and the Bay of Islands and technical expertise in remote sensing, spatial analysis, and the analysis of Māori material culture.

## **2. Review of Muriwhenua Incorporated's Submission on Proposed Plan Changes**

Muriwhenua Incorporated provided a submission to FNDC to rezone their land-holdings in order that they be properly utilised to benefit iwi. This includes ensuring the long-term resilience of settlements by allowing construction in areas outside of those susceptible to the impacts of climate change.

The Muriwhenua Inc. submission does not reference archaeological sites but does note that utilisation of land holdings can be done in a manner that meets environmental (and presumably heritage) objectives.

I have conducted a high-level desk-based review of the land associated with this submission, including review of selected historical survey plans, LiDAR data and New Zealand Archaeological Association site recording scheme. This review has identified that the land covered in the Muriwhenua Inc. submission include 620 recorded archaeological sites (Figure 1). 524 of these are Māori in origin, with the balance relating primarily to Kauri gumdigging. A brief review of LiDAR data suggests further unrecorded sites are also present. 133 of these sites have been updated or recorded post the year 2000, but most were recorded during a large-scale survey of northern land blocks by Janet Davidson in the 1970s and have not been revisited since. As a result, the accuracy of the spatial data associated with the sites is very low.

A review of the proposed rural settlement zone identified recorded archaeological sites between Te Hapua Road and the Waitiki Channel (Figure 2). The spatial accuracy with which these sites are recorded is low, and several sites overlap with the zones identified in the submission (Figure 2). Further archaeological assessment at a more fine-grained scale is required to accurately locate these sites and understand if development in the proposed areas will result in any effects.

Similarly, a review of the Waitiki Landing area identified no recorded archaeological sites (Figure 3). However, a historical survey plan from 1895 (SO 8508) shows the existence of a gum store in the vicinity. Further archaeological assessment at a more fine-grained scale is required to accurately locate this site and understand if development in the area is likely to have any effects.

## **3. Conclusions**

There are no archaeological matters that specifically prohibit rezoning.

However, I note that some aspects of the proposal designed to free up activities on the whenua may result in less engagement with FNDC. Although heritage is primarily managed through the HNZPT Act (2014), the resource consent process in the RMA (1991) often leads to the identification of potential heritage effects that are then assessed by an archaeologist. Poor spatial accuracy of recorded sites and reduced engagement with council may therefore result in poorer heritage management outcomes.

Muriwhenua Inc. should be made aware that any subsequent development must comply with the Heritage New Zealand Pouhere Taonga Act (2014). Given the large size of the block a widespread survey is impractical, but project specific surveys (e.g., around Te

Hapua) would be effective. Specific advice can be sought from the Northland regional office of HNZPT.

Please contact me if you have any questions about the advice provided.

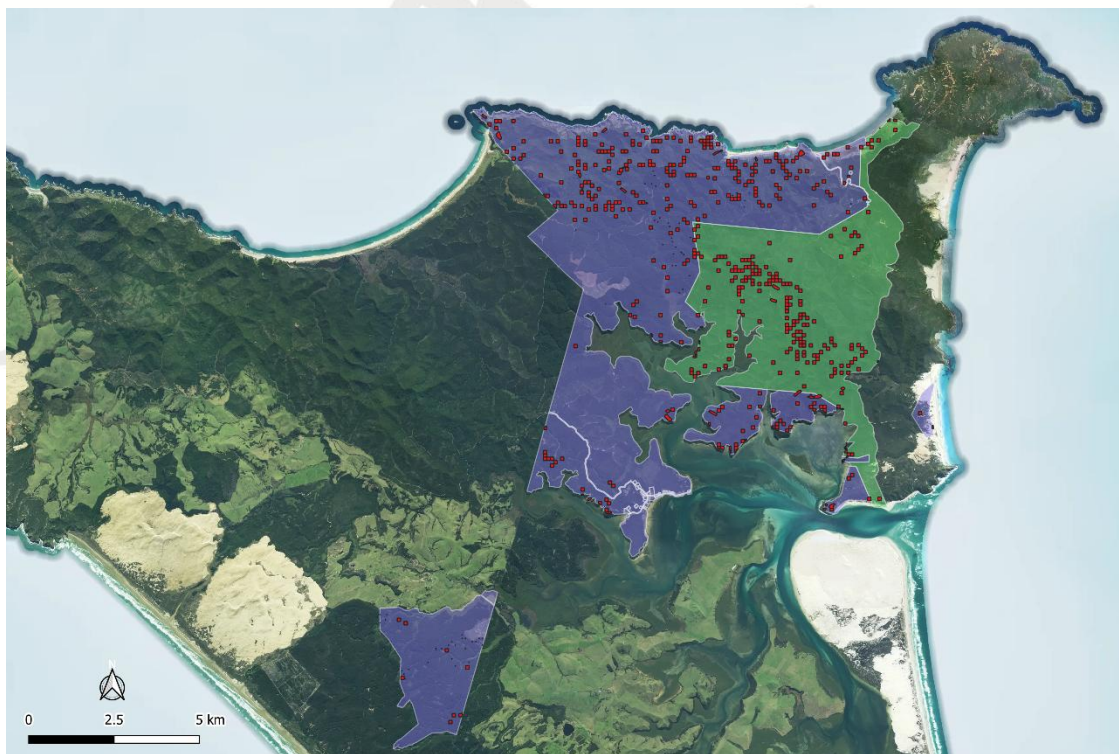
Noho ora mai,



Dr Andrew Brown

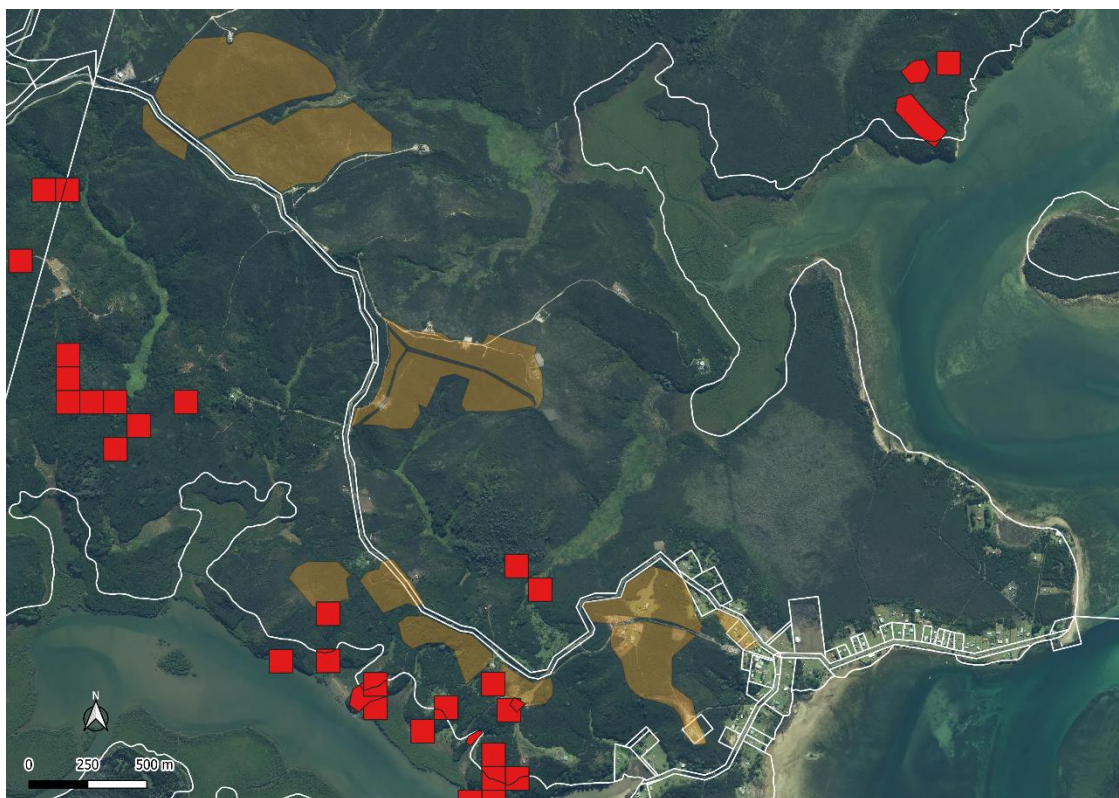
Director | Principal Archaeologist

Horizon Archaeology Ltd

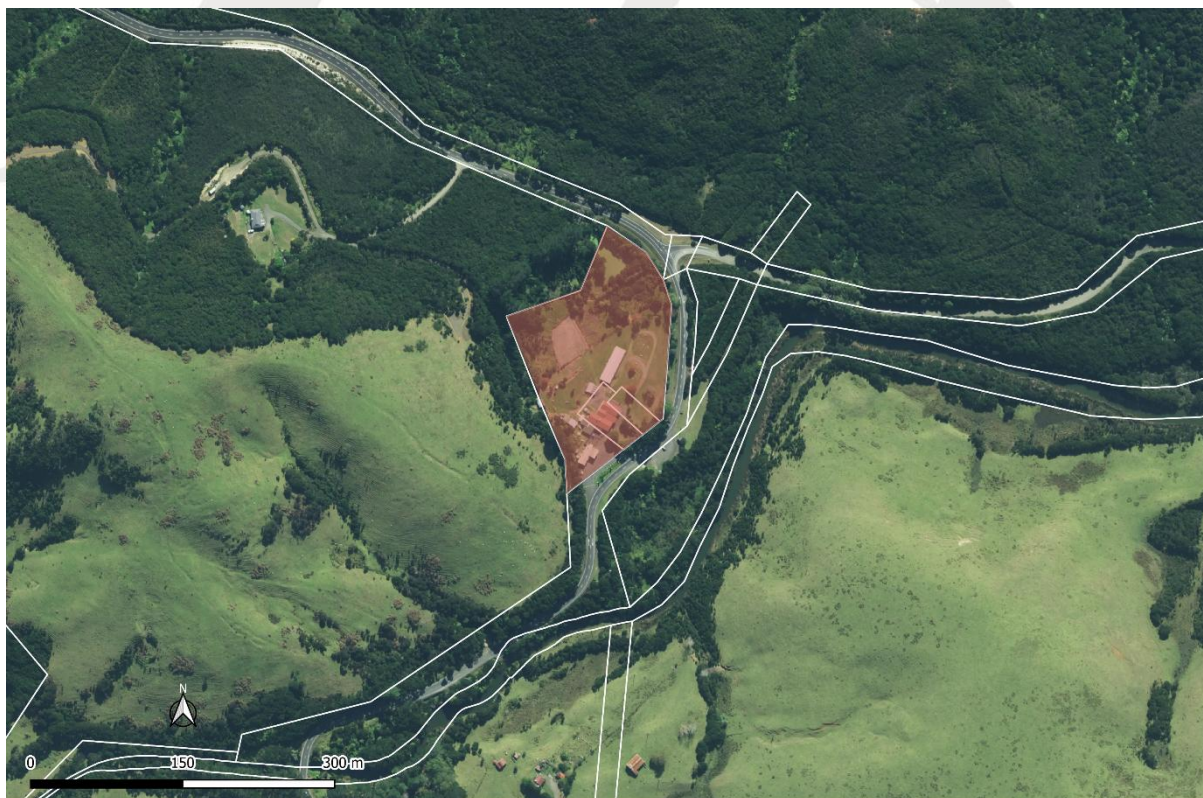


**Figure 1** – Distribution of recorded archaeological sites (red squares) on the Muriwhenua lands (purple) and adjacent block (green; Source: ArchSite).





**Figure 2** – Distribution of recorded archaeological sites (red squares) near the proposed Māori Purpose Rural Settlement Zones (yellow; Source: ArchSite).



**Figure 3** – The Waitiki Landing area (red polygon), no recorded archaeological sites have been identified in the immediate area.