

**BEFORE THE COMMISSIONERS APPOINTED BY THE CENTRAL OTAGO  
DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of RC230179 an application for a 33-lot  
subdivision at Rocky Point on Tarras-  
Cromwell Road (SH8)

**BETWEEN** **TKO PROPERTIES LIMITED**

Applicant

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**STATEMENT OF EVIDENCE OF CHRIS JENNINGS**

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Dated: 18/11/2024

## **Statement of evidence of Chris Jennings**

### **Introduction**

[1] My full name is Christopher Gregg Jennings.

[2] I am the Senior Archaeologist of Southern Pacific Archaeological Research (SPAR), a research unit and consultancy based in the Archaeology Programme at the University of Otago. My qualifications and experiences are as set out in my evidence in chief.

### **Scope of evidence**

[3] My summary will address:

- (a) my original archaeological assessment of the proposal and evidence in chief;
- (b) Evidence of Dr Matthew Schmidt on behalf of the Director-General of Conservation Tumuaki Ahurei, Dated 11 November 2024

### **Summary**

[4] I have assessed the effects the proposed subdivision will have on archaeological sites present in the project area (Lot 1 DP 561457). Two sites in poor condition would be affected by the proposed development.

[5] In January 2023 I prepared the assessment report entitled: "Archaeological assessment of proposed Rocky Point Subdivision, Central Otago" 2022

[6] DOC Senior Heritage Advisor Dr Matthew Schmidt has noted "clear deficiencies" in the archaeological assessment in regards to archaeological field survey coverage, the history of the Clutha Valley, and management options.

[7] Dr Schmidt visited the project area and identified additional features he asserts are related to a water control network. Dr Schmidt has demonstrated his interpretation of this complex in his appendices. All additional features located are outside the development area and will not

be affected by development of the subdivision. Dr Schmidt argues that the sites are in good condition based on his experience.

- [8] Acknowledging that these features are most likely associated with gold mining, I concede that this would more specifically change their historic associations and contextual value in my original assessment. However, this context does not materially change my assessment of the majority of the values of Sites G41/771 and G41/773. They have low information potential, are in poor condition and have low amenity value, even when considered part of a site complex. Without the provision of detailed exposition (e.g. signage) a lay observer would not observe these features and understand them as part of a wider complex. However sites recorded with water races, dams and reservoir features, are common in Otago (over 560 sites recorded with dam or reservoir features on ArchSite and over 2,500 recorded as gold mining sites).
- [9] Dr Schmidt has found fault with the recommendations to manage the heritage as laid out in my assessment. I acknowledge that avoidance of an archaeological feature is the preferable approach in heritage management.
- [10] Site destruction is normally ultimately regulated by the archaeological authority process under the Heritage New Zealand Pouhere Taonga Act (2014). As well as this, the sites in question also are relevant to the Conservation Covenant dated 18 August 2000. As set out in my evidence, due to the poor condition and low values of G41/771 and G41/773, these would normally be appropriately managed under a general authority to modify or destroy a site.
- [11] If avoidance is an option, it should be explored, however to be in line with international principles of conservation (Burra Charter 2013), this approach cannot preserve the feature without consideration of its surrounding setting in the landscape. Isolating the feature and building housing lots around G41/771 will impact the setting of the feature within the landscape and would not necessarily provide a positive heritage outcome. If recorded in detail prior to development of the subdivision, all of the archaeological features could be considered within their wider contexts. This information would be publically available and would

potentially provide better outcomes for public education beyond simply retaining a feature in isolation.

- [12] G41/771 and G41/773 will continue to degrade without intervention. Detailed recording of the site prior to further development or degradation is an appropriate response.
- [13] Detailed recording of the features sites G41/771 and G41/773 will preserve the remaining archaeological information of these sites. The remaining sites in the complex are outside the development area and will not be affected by earthworks or other modification.
- [14] ArchSite, the New Zealand Archaeological Association's national inventory of archaeological sites, retains information on destroyed sites, so any contextual value of these features could still be evaluated within the wider landscape.