

Under the Resource Management Act 1991
In the matter of Notices of Requirement to enable the construction, operation and
maintenance of the City Rail Link

Between

Auckland Transport

Requiring Authority

and

Auckland Council

Consent Authority

Statement of Evidence of Rod Clough

Qualifications and Experience

1. My name is Rodney Edward Clough. I am the Director of Clough & Associates Limited, Heritage Consultants.
2. I have the following qualifications, professional affiliations and experience:
 - (a) I hold a Doctorate in Archaeology from the University of London and a Master of Arts in Anthropology from the University of Auckland;
 - (b) I am a member of the New Zealand Archaeological Association (NZAA), and served on its Council for several years, including as President (2009-2011);
 - (c) I am a member of the New Zealand Historic Places Trust (NZHPT) and the International Committee on Monuments and Sites (ICOMOS);
 - (d) I have 40 years of experience in the field of archaeology including research, survey, investigation, analysis and report preparation, covering a variety of time periods and geographic locations, and over the last 20 years have largely focussed on New Zealand archaeology;
 - (e) I lectured in archaeology at the University of Auckland for several years prior to establishing my consultancy (1987-1994), and have continued to carry out joint research projects with the University; and
 - (f) my practice carries out a range of work relating to cultural heritage management, in particular archaeological assessments relating to the Resource Management Act 1991 (RMA) and Historic Places Act 1993 (HPA) requirements, conservation and management plans, survey and inventory, and mitigation investigations. These have included numerous surveys and heritage assessments in the Auckland Region.

3. I have been the project archaeologist on a large number of other infrastructure projects including:
- (a) Waterview Connection project;
 - (b) Victoria Park Tunnel project;
 - (c) Britomart Transport Centre project;
 - (d) Central Motorway Junction project;
 - (e) Grafton Gully SH16 extension;
 - (f) Southwestern Interceptor project;
 - (g) Auckland Regional Women's and Men's Prison projects at Wiri;
 - (h) Mount Eden Prison redevelopment project; and
 - (i) the recent streetscape upgrade works in Auckland's Central Business District.

Background and role

4. The City Rail Link (CRL) project (the Project) is a 3.4km underground passenger railway (including two tracks and three underground stations) running between Britomart Station and the North Auckland Line (NAL) in the vicinity of the existing Mount Eden Station. CRL also requires an additional 850m of track modifications within the NAL. The stations included in the CRL Notice of Requirement (NoR) have been temporarily named Aotea Station, Karangahape Station and Newton Station.
5. Clough & Associates was engaged by Auckland Transport's Principal Advisor team (PA) in support of the NoR work stream. The PA is led by Aurecon NZ Ltd and comprises the principal partners of Aurecon NZ Ltd, Mott MacDonald, Jasmex and Grimshaw. The PA reports directly to Auckland Transport's Infrastructure Delivery work stream which is responsible for delivery of the CRL project. The PA is also supporting the NoR and Property work streams.

6. I am familiar with the project location, track alignment and the site specific locations for each proposed station. I have undertaken an initial heritage study and a full archaeology assessment for the CRL Project.
7. My role in the the Project team has included preparation of an assessment of the potential impacts of the Project on archaeological values.¹ I undertook this and previous assessments with my colleagues Charlotte Judge, Sarah Macready, and Dr Simon Bickler.² A separate assessment of effects on built heritage values was undertaken by Salmond Reed Architects.³ My involvement in the proposed Project began in 2009 when I was commissioned to carry out an initial heritage study identifying archaeological and built heritage constraints for a route option assessment.⁴ A heritage assessment for the preferred route was prepared in November 2010.⁵
8. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note (2011) and I agree to comply with it in the same way as if I were presenting evidence in the Environment Court. I confirm that this evidence is written within my expertise, except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

¹ R. Clough, C. Judge and S. Macready, City Rail Link Project: Archaeological Assessment, prepared for Auckland Transport, July 2012. Appendix 3 in the Assessment of Environmental Effects

² All three are experienced and qualified archaeologists who have worked for Clough & Associates for over five years. Charlotte Judge has a Masters degree from University of Auckland, Sarah Macready a Masters degree from the University of London, and Simon Bickler a PhD from the University of Virginia.

³ Appendix 4 in the Assessment of Environmental Effects

⁴ R. Clough, S. Macready and S. Bickler, Draft CBD Rail Link Study: Phase 1 Heritage Assessment of Route Options, prepared for BECA, December 2009.

⁵ R. Clough, C. Judge, S. Macready and S. Bickler, Auckland CBD Rail Link Study: Heritage Assessment, prepared for APB&B, November 2010.

Scope of Evidence

9. My evidence will address the following:
 - (a) the methodology used for assessment of archaeological values;
 - (b) archaeological values in the Project area;
 - (c) effects of the Project on archaeological values;
 - (d) proposed management and mitigation of effects;
 - (e) response to submissions;
 - (f) response to Planner's Report; and
 - (g) proposed conditions.

Summary of Evidence

10. The greater part of the CRL will be constructed through deep tunnelling below the level of any archaeological remains, and any effects will be confined to the areas where surface works are planned.
11. The extent of any surviving archaeological remains beneath buildings and roads within the construction footprint cannot be confirmed until they are exposed through earthworks.
12. The Project will impact on an area of 19th century reclamation in the vicinity of Queen Elizabeth II Square and the Central Post Office (CPO) recorded as archaeological site R11/1379.
13. The Project has the potential to impact on 19th century infrastructure and other remains in the cut and cover tunnel section along Albert Street and within the Aotea Station footprint and also on early residential remains at the Newton Station entrance (257 Symonds Street).
14. Elsewhere within the proposed designation footprint the potential is low for archaeological remains to be exposed.

15. The likely significance of the archaeological remains that may be encountered will in my opinion be no more than moderate (that is, of low to medium, rather than high archaeological value). Redesign of the project to avoid archaeological remains would be neither feasible from a project construction perspective, nor warranted on the basis of their significance.
16. Effects on subsurface archaeological remains exposed during construction can be appropriately mitigated through archaeological investigation to recover information relating to the early history of Auckland. This will require an Authority under the HPA, and the preparation of an Archaeological Management Plan to be included within the Construction Environmental Management Plan (CEMP).
17. The recovery of any significant information through archaeological investigation would be a positive effect of the Project, and would also provide opportunities for public information through interpretation panels and displays within the stations.

NoR assessment of archaeological values

Methodology

18. Archaeological sites beneath modern buildings and streets in urban environments can rarely be identified prior to being exposed in the course of redevelopment work. The approach to archaeological assessment is therefore to identify historically recorded activities and assess the potential for archaeological evidence to have survived on the basis of later modifications, taking into account the results of any previous archaeological investigations in the vicinity.
19. The assessment of potential effects on archaeology involved:
 - (a) an initial search of the NZAA archaeological sites database, the Auckland Council's Cultural Heritage Inventory, the Auckland Council District Plan heritage schedules and the NZHPT Register of Historic Places for information on archaeological and other cultural heritage sites within or near the Project area;

- (b) a route inspection with photographs taken of the built environment along the proposed route; and
 - (c) a review of relevant archaeological reports and other literature relating to the project area for information on previous archaeological investigations and the general historical context.
20. The assessments did not include detailed property by property archival research.⁶ This was not considered to be warranted for designation purposes, firstly because the detailed design has not yet been carried out to determine the extent of surface works that might affect archaeology, and secondly because such research could not confirm that subsurface archaeological sites are present.
21. The assessments did not include an assessment of effects on Maori cultural values. Auckland Transport has and continues to consult tangata whenua regarding cultural effects and this is addressed through the Cultural Values Assessment. Two scheduled Maori heritage sites are known to be located within the Project area, but these are understood to be cultural rather than archaeological sites. A Cultural Values Assessment has been prepared by Mr Tama Hovell.⁷

Archaeological Values in the Project Area

22. Subsurface archaeological remains would generally be present only within approximately 2-3m of the present ground surface, with the exception of deeper features such as wells, reclamation deposits (where land has been reclaimed from the sea by infilling), and any remains in deep infilled gullies.
23. The main area within the designation footprint where subsurface archaeological remains are known to be present is in and around Queen Elizabeth II Square and beneath the Central Post Office (CPO). This area (shown in **Figure 1**) was reclaimed between 1875 and 1886

⁶ An exception being 42 Wellesley Street, near the Aotea Station, research on which is presented as Appendix C in the Technical Report to support Assessment of Environmental Effects (City Rail Link Notice of Requirement): Archaeological Assessment.

⁷ Prepared for Auckland Transport and comprising a response in part to a s92 request dated 30 August 2012 from Auckland Council.

and is a recorded archaeological site (R11/1379). Previous archaeological investigations during the construction of the Britomart Transport Centre exposed historic reclamation deposits containing 19th century artefacts, remnant wharves, drainage systems, and the remains of a boat and other items buried on the former sea floor.⁸ Similar remains will still be present in areas that have not been fully excavated for the Britomart and other projects, and these probably include remains of the early Queen Street wharf.



Figure 1. Affected reclamation areas: Reclamation 4 (Queen Street to Albert Street 1875-1877), and Reclamation 8 (Railway Station reclamation 1879-1886)

24. In other areas within the designation footprint it is not known what subsurface archaeological remains may be concealed under roads, buildings and sealed surfaces. The construction of modern buildings will generally have removed all earlier remains. However, 19th and early 20th century buildings were often built without basements or deep benching and the footings of earlier buildings, rubbish pits, wells and other features may survive beneath buildings of that date. Surviving 19th century buildings are also of intrinsic archaeological value. Roads that were first formed in the 19th century may contain earlier

⁸ S. Bickler, B. Baquié, R. Clough, T. Mace, D. Prince, M. Plowman and M. Turner. Excavations at Britomart, Auckland (R11/1379). Clough & Associates Monograph Series No. 1. Report prepared for Auckland City Council. March 2005.

road surfaces, historic drainage elements and possibly building foundations, where street frontage has been taken for road widening.

25. One specific area of archaeological potential identified is a vacant property at 257 Symonds Street, where an entrance to Newton Station is proposed. An early house known as 'Cotele' was located there, built by naval officer and newspaper editor David Burn in the 1840s. Although replaced by a larger villa c.1900-1910, which was demolished in the 1990s, the property has remained undeveloped and surviving remains relating to the 19th century villa and its gardens are possible.
26. Buried archaeological remains in urban contexts are of value as they can provide significant information about the development of early towns and cities. Archaeological investigations in central Auckland have recovered a great deal of previously unrecorded information about Auckland's early commercial, civic, military, industrial and residential history and about the lifestyles of its 19th century population.
27. Pre-European archaeological remains in the developed parts of the city are very rare due to the landscape modifications that have occurred from the earliest days of European settlement. A notable exception was the discovery of Maori gardening implements on the banks of the former Wai Horotiu stream between Darby Street and Victoria Street West (outside the Project area).⁹ However, pre-European remains in urban Auckland normally only survive within parks and reserves, and would not be expected within the construction footprint.
28. I consider the potential significance of subsurface archaeological remains that may be encountered during the project to be moderate (i.e. of low to medium rather than high archaeological value), based on my experience of previous excavations of reclamation areas and other sites within the city. The primary value of the remains likely to be encountered is in the information they could provide through archaeological investigation.

⁹ S. Best. The Queen Street Gaol: Auckland's First Court House, Common Gaol and House of Correction (site R11/1559). Auckland Conservancy Historic Resource Series 2. Auckland, Department of Conservation. 1992.

Effects of the Project on Archaeological Values

29. The CRL will be constructed for the most part (1.9km of the 3.4km route) through tunnelling deep below the ground surface. This would generally be below the level of any archaeology and therefore will have no effect.
30. It is only in areas where surface works are proposed that there is the potential for direct impact on archaeology. Surface works include cut and cover tunnels up Albert Street, the footprint of the Aotea Station, station entrances, vents, and the east and west connections to the NAL near Mount Eden Station. However, not all surface works are located within areas of archaeological potential.
31. I consider that there is reasonable potential to impact on subsurface remains in the following areas:
- (a) the cut and cover section from Lower Queen Street (adjacent to the CPO) and up Albert Street, which extends through the historic reclamation area (site R11/1379) and may also expose early infrastructure beneath Albert Street;
 - (b) the Aotea Station footprint, where there is some potential for 19th century remains at 42 Wellesley Street and beneath the buildings at 51-53 Victoria Street West, as well as for early infrastructural remains beneath Albert Street; and
 - (c) at 257 Symonds Street where an entrance to Newton Station is proposed, and where remains relating to the 19th century villa 'Cotele' might have survived.
32. In other areas where surface works are proposed, I consider the potential for archaeological remains is low. There is little if any potential for archaeological remains at the cut and cover tunnel sections within the surface designation footprint area starting at the NAL designation and extending north.
33. The exposure of any archaeological remains during construction would provide the opportunity for archaeological investigations to recover

information relating to Auckland's early history. This would be a positive effect of the Project.

Management and Mitigation of Effects

34. Impacts on buried archaeological remains can be appropriately mitigated through the archaeological provisions of the HPA. An application for an Authority to modify archaeological sites should be made prior to construction so that processes can be put in place to investigate and record any archaeology that may be exposed.
35. Further historical research relating to the archaeological potential of the surface construction work areas associated with Aotea Station, Karangahape Station, and Newton Station should be carried out as part of the Authority application, once the precise extent of the surface works has been defined.
36. A Historic Heritage Management Plan will be prepared, setting out requirements and procedures for archaeological monitoring of preliminary earthworks in areas of archaeological potential; for accidental discovery of archaeological remains; and for the recording of any archaeological evidence before it is modified or destroyed. The Historic Heritage Management Plan will be provided as part of the application to the NZHPT and included in the CEMP.
37. If significant archaeological remains are found during the construction of the CRL, there will be opportunities for interpretation panels and displays (if appropriate) to be installed within the relevant station(s) to inform the public about the history of the area.

Response to submissions

38. No submissions raising issues relevant to archaeology have been lodged.

Response to Planner's Report

39. Section 9.12.5 of the Planner's report raises a few points which require some response, in particular within the following paragraph:

"Any assessment of environmental effects must address s6(f) of the RMA and proposed mitigation for adverse effects on heritage should recognise and provide for historic heritage as a matter of national importance. The Clough and Associates (July 2012) report considers that mitigation of effects is appropriate despite the fact that effects are not fully identified and therefore the potential effects remain unknown. The scale of effects and possibility of avoidance are not discussed. Given the assumption that effects on archaeology will not be able to be avoided as they will only really present themselves during the construction phase of the project, mitigation of the effects is the only option presented. Simply mitigating effects on archaeology under the HPA is not necessarily considered appropriate mitigation for effects on historic heritage under the RMA. The Clough and Associates (July 2012) report does not present a range of potential mitigation options."

40. Firstly, it is incorrect to say that the potential effects remain unknown – I have assessed these based on the type of remains that may be present according to former land use and comparison with archaeological remains from similar contexts that have been exposed by previous excavations in the city. The potential effects are the destruction of subsurface archaeological remains within the proposed areas of surface works. The types of remains that may be encountered have been described earlier in my evidence. It is the actual effects that will not be known until existing buildings and hard surfaces are removed and the extent and nature of any archaeological remains is confirmed.
41. The statement that *"the scale of effects and possibility of avoidance are not discussed"* is correct, but there are clear reasons for this. The scale of effects cannot be determined until the extent of subsurface remains in the affected areas is known (the only exception being within the reclamation area). I did not discuss avoidance because I do not consider it feasible in a project of this nature. The CRL is located within an urban environment with tight spatial constraints, and as the project

involves a subsurface rail link, with deep excavations at the station locations and along Albert Street to provide access to the railway, any archaeological remains that may be present are likely to have to be removed.

42. I feel that the statement that “*proposed mitigation for adverse effects on heritage should recognise and provide for historic heritage as a matter of national importance*” needs some further clarification. It is “*the protection of historic heritage from inappropriate subdivision, use and development*” that must be recognised and provided for as a matter of national importance under section 6(f) of the RMA. I have always understood that “*inappropriate...use and development*” relates to the significance of the effects on historic heritage that would result from any proposed use and development. In this case there are no highly significant archaeological sites known to be present in the proposed areas of works, and I consider the types of archaeological remains that may be present are unlikely to be of more than moderate significance, consisting of areas of reclamation, drainage and other early infrastructure elements, and perhaps remains of early buildings in the form of postholes, foundations, and associated artefacts and infrastructure elements. Such remains are relatively common on sites within the city and, while of archaeological value, their archaeological significance relates mainly to the information that can be recovered from them through archaeological investigation. The CRL is an infrastructure project that would be of considerable public benefit, and in my opinion the proposal is appropriate, provided that the archaeological effects are mitigated by the investigation and recording of any archaeological remains prior to their removal, and the recovered information is made available to the public. This is the most appropriate form of mitigation for the modification or destruction of archaeological sites, which is why it is specifically provided for in the HPA.
43. I would query the statement that “*simply mitigating effects on archaeology under the HPA is not necessarily considered appropriate mitigation for effects on historic heritage under the RMA*”. Under section 108(4) of the RMA conditions may be imposed relating to making and recording measurements, taking samples, carrying out analyses, surveys, investigations, etc. Archaeological investigations

would therefore be a very appropriate form of mitigation under the RMA, were it not for the fact that the HPA makes specific provision for the archaeological investigation of sites that are to be modified. As a result it is neither necessary nor appropriate for the Council to impose a parallel set of conditions relating to archaeological investigation. From an archaeological perspective, the important thing is that this mitigation is carried out, regardless of which legislation it is carried out under. The Council has a significant role to play in ensuring that this mitigation is carried out by setting conditions such as those proposed in my report and in the draft conditions (see below), requiring that an archaeological management plan (to be included in a broader Historic Heritage Management Plan) is developed as part of the CEMP. I note that the Council also has a significant role in the protection and management of archaeological remains post-dating 1900 that are not covered by the HPA. I consider the heritage provisions of the two Acts to be complementary; they can work well together to ensure appropriate heritage outcomes. I note that it is the government's stated objective that the two Acts should work in alignment, without unnecessary duplication of process.¹⁰ I would be concerned if additional mitigation requirements were to be routinely imposed on projects by councils simply because the most appropriate form of mitigation (archaeological investigation) is provided for under a separate Act.

44. That said, I fully support additional mitigation in the form of interpreting any archaeological remains that may be exposed, for example through interpretation signs and displays within the stations (as noted in paragraph 37 above).
45. However, I do not consider it practical to suggest, as the Planner's report does, that design should be kept flexible enough to "*identify opportunities to incorporate or preserve in-situ ...archaeological features or findings*" and to suggest (in amendments to the draft conditions) that "*as far as practicable, the archaeological investigations*

¹⁰ Government review of archaeological provisions under the HPA and RMA (RMII-H: <http://www.mfe.govt.nz/cabinet-papers/progress-phase-two-resource-management-reforms.html>), and Explanatory note to the Heritage New Zealand Taonga Bill.

shall occur as deemed necessary prior to detailed project and construction design in order to identify opportunities for avoidance, remediation or mitigation of adverse effects". Generally for such large infrastructure projects in urban contexts the detailed design has been carried out before the start of demolition and excavation, the construction timeframes are tight once works are under way and the costs of any redesign to avoid archaeology (even if this were feasible) would be extremely high. In my opinion the costs of avoidance and mitigation must bear some relationship to the significance of the historic heritage affected. In this case the high costs of redesign to preserve what would only be remains of (at most) moderate significance could not be justified. In addition, Mr William Newns has confirmed to me that the tight spatial constraints would preclude any significant changes in design in response to archaeological discovery. However, the much lower costs of minor interior design to incorporate interpretation and displays within the stations would be appropriate and proportional to the significance of any archaeological remains that are likely to be exposed.

46. I can think of only one location where archaeological investigation could feasibly be carried out in advance, and that is in the vacant property at Newton Station, where the former villa Cotele stood. I would certainly support investigations being carried out here in advance so that the area can be investigated without the constraints of working under site construction conditions. However, any remains are likely to consist of post holes indicating former structures, perhaps garden elements such as former garden paths, and perhaps rubbish pits or a well containing artefacts that could tell a story about the people who lived there. The significance of these remnants would lie in the information they can provide about Cotele through archaeological investigation (which would largely destroy them in the process). I do not consider that such features would merit expensive redesign to preserve them in situ, even if that could be done.
47. I recognise that there have been occasions where the discovery of archaeological remains has resulted in redesign and preservation in situ (generally within the basements of buildings). The Rose Theatre in London, and Plimmers Ark and elements of Te Aro Pa in Wellington are

examples of this. The costs were high, but were warranted by the very considerable significance of the remains. That would not apply in this situation.

Proposed conditions

48. The Proposed Conditions 14A and 23 relate to managing the adverse effects on historic heritage, including archaeology, during construction of the CRL. This will be achieved through the inclusion of appropriate matters within the CEMP. These matters will include:
- a) how procedures for archaeological investigations and monitoring of preliminary earthworks are to be implemented in areas where there is potential for archaeological remains to be discovered;
 - b) procedures for the discovery, including accidental discovery, of archaeological remains including:
 - the ceasing of all physical construction works in the immediate vicinity of the discovery;
 - training procedures for all contractors regarding the possible presence of cultural or archaeological sites or material, what these sites or material may look like, and the relevant provisions of the Historic Places Act 1993 if any sites or material are discovered;
 - practices for dealing with the uncovering of cultural or archaeological remains and the parties to be notified (including but not limited to appropriate iwi authorities, the Auckland Council Consents Monitoring officer, the New Zealand Historic Places Trust, and the New Zealand Police (if koiwi (human skeletal remains) are discovered);
 - procedures to be undertaken before physical works in the area of discovery can start again, including any iwi protocols, recording of sites and material, recovery of any artefacts, and consultation to be undertaken with iwi, Auckland Council Consent Monitoring officer and Heritage

Department, and with the New Zealand Historic Places Trust;

- c) procedures for recording any archaeological remains or evidence before it is modified or destroyed; and
- d) cross references to the specific sections in the Communication and Consultation Plan which detail how the Auckland Council Heritage Department, the New Zealand Historic Places Trust, mana whenua (see condition 8), and the general public are to be communicated and liaised with on the management of adverse effects relating to archaeology.

49. The Council has suggested a number of changes to the Proposed Conditions, which in general I consider appropriate. However, I do not consider some of the proposed wording relating to avoidance or remediation through project design to be feasible or warranted for the reasons I have already given, and I note that remediation is generally not an option that applies to archaeological sites. Nor do I consider that some of the proposed methods of archaeological investigation are appropriate – for example geotechnical test pits and boreholes would provide little useful information about in situ archaeology and could not be used as the basis for any detailed design aimed at avoiding sites.

50. I therefore suggest that Condition 23 (b) as amended by Council is further amended as follows:

“How procedures for archaeological investigations and monitoring of preliminary earthworks are to be implemented in areas where there is potential for archaeological remains to be discovered. As far as practicable, the archaeological investigations shall occur as deemed necessary prior to bulk earthworks in order to facilitate recording and recovery of information. ~~Methodology shall be determined through the preparation of the HHMP and may include archaeological trial investigations (e.g. archaeological excavation of geotechnical test pits; archaeological monitoring of boreholes; machine stripping with~~ Methodology shall be determined through the preparation of the HHMP and may include archaeological trial investigations (e.g. archaeological excavation of geotechnical test pits; archaeological monitoring of boreholes; ~~machine stripping with~~

subsequent manual investigation, and archaeological investigation of building footprints following demolition and site clearance) in appropriate locations;”

51. I also suggest that the final bullet point of Condition 23(c) as proposed by Council is amended as follows:

“Procedures for recording any archaeological remains or evidence before it is modified or destroyed, including opportunities for the conservation and preservation of artefacts and ecofacts (biological material) that are discovered. Consideration shall be given to the incorporation of in-situ material or artefacts into the displays and interpretation within design of stations and / or public places associated with the City Rail Link project and provision for ‘post-excavation’ assessment analysis and publication of material within 24 months of completion of construction.”

52. These conditions, with the proposed amendments, would ensure that any adverse archaeological effects are mitigated and managed appropriately.

Conclusion

53. Any effects of the project on subsurface archaeological remains will be confined to the areas where surface works are planned. These have the potential to affect 19th century remains in the cut and cover section from Lower Queen Street up Albert Street; within the Aotea Station footprint; and at the Newton Station entrance (257 Symonds Street). In other areas of surface works there is little archaeological potential.
54. Any effects on subsurface archaeological remains exposed during or prior to construction can be appropriately mitigated through archaeological investigation (under Authority from the NZHPT) to recover information relating to the early history of Auckland. The recovery of such information would be a positive effect of the Project, as would the incorporation of information and displays into the stations and other public areas (depending on what is found).

55. Overall I consider the potential effects of the CRL Project on archaeological values to be minor and the Proposed Conditions relating to archaeology (subject to the further amendments proposed) will ensure that any adverse effects are appropriately managed and mitigated.

Rod Clough

2 July 2013