



## An Archaeological Scoping Assessment of Potential Growth Areas for Bulls, in the Rangitikei District



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## QUALITY INFORMATION

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Cover image: Bulls, Rangitikei, looking across the site of the Bank of New Zealand, 1879. (1/2-011689-F, National Library)

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## INTRODUCTION

The Rangitikei District Council is considering options for urban growth at Bulls and requested that InSite Archaeology Limited undertake a preliminary review with respect to archaeology / heritage of the three potential growth areas identified (Figure 1). The results of the research presented here does not comprise a full archaeological assessment with detailed historical background, formal site descriptions, assessments of values and effects etc. Rather, this advice note presents a high-level overview of the potential growth areas, giving:

- environmental and historical context;
- known and potential archaeological risks; and,
- consenting / management advice.

In the course of this research the following range of sources were reviewed:

- historic survey plans and aerial photographs;
- historic title deeds;
- GNS geology web map (<https://data.gns.cri.nz/geology/>);
- historic newspaper articles (PapersPast);
- Alexander Turnbull Library archives (online only, <https://natlib.govt.nz/>);

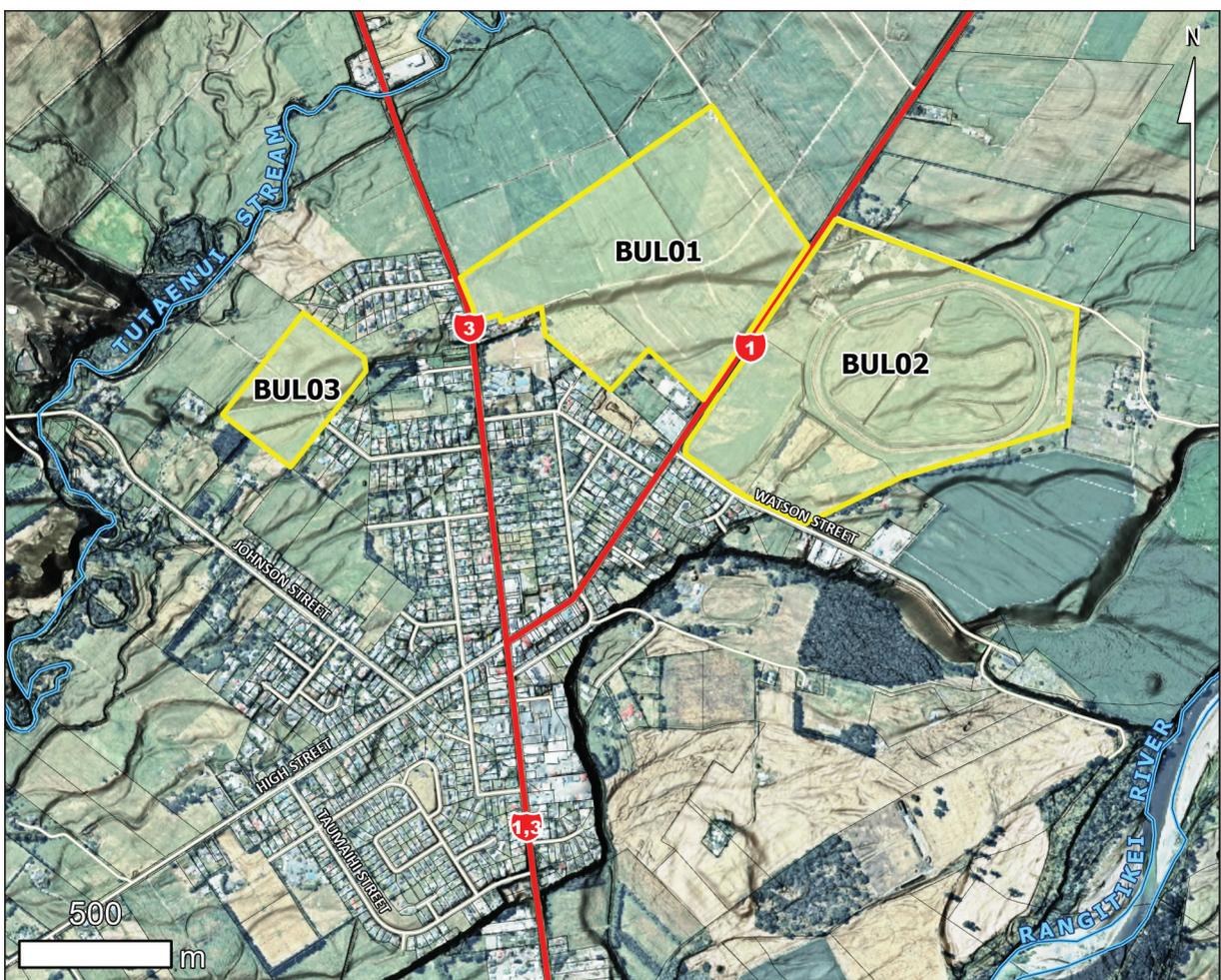


Figure 1: Option areas evaluated for future urban growth at Bulls.

- NZ Gazette;
- Published books and pamphlets; and,
- Information provided by landowners during field inspections.

As appropriate to the high-level nature of this work, the review of sources was not exhaustive but focused on the material that was most readily accessible and provided information generally applicable to all of potential growth areas. Additionally, brief field inspections were undertaken of all three areas on the 13th of February, 2025.

### **Limitations**

There is a deep and detailed body of published and archival historic works available for Bulls and the Rangitikei district with respect to its settlement and occupation by Pakeha in the nineteenth century. However, historic records are far fewer in regards to earlier occupation by Māori and what does exist generally pertains to Native Reserves (such as at Parewanui, Matahiwi, Reureu, etc.) and lands outside of the growth areas. The three growth areas fall within the bounds of the Rangitikei lands purchased by the Crown in 1849, before the Native Land Court<sup>1</sup> was established and therefore without a detailed Court enquiry exploring Māori title and /or historic occupation. While it is evident that the Ngāti Apa, Rangitāne and Muaūpoko iwi have a long history of occupation within the Rangitikei-Manawatū districts (and beyond), and more recently (i.e., since the early nineteenth century) certain hapū / iwi of Ngāti Raukawa, this assessment of Māori occupation is limited to general statements by analogy to areas where more detailed records are available.

Additionally, it was initially anticipated that analysis of historic title deeds would be a key component in the analysis of historic Pākehā occupation. However, after two rounds of historic title deed purchases from the Land Information New Zealand Land Record Search (<https://lrs.linz.govt.nz/search/>) it was clear that nineteenth century land records would not be as straightforward to compile as first indicated by the QuickMap service (<https://www.quickmap.co.nz/>) and that the available time for this research would could be better spent looking into other sources. A full exploration of the historic title records should be undertaken for whichever of the growth area option(s) are advanced, if any.

## ENVIRONMENTAL CONTEXT

Geological data sourced from GNS indicates that all three areas are situated on OIS2 (Late Pleistocene) river deposits of “[p]oor to moderately sorted gravel with minor sand and silt underlying terraces.” Minor peat deposits are associated with this geological unit but no actual or potential peat deposits were identified in any of the potential growth areas. The aspect of all three areas is generally flat, with shallow terraces in places where the Rangitikei River has formerly cut a path.

The earliest survey plans of the Rangitikei District indicate that when European settlers first

<sup>1</sup> Renamed the Māori Land Court in 1947.

arrived at what is now the township of Bulls, land to the west and south of Daniell Street, including BUL03, was forested.<sup>2</sup> To the east and north of Daniell Street, encompassing areas BUL01 and BUL02, were open grassland and light scrub (Figure 2). Robert Park, Principal Surveyor for the New Zealand Company, described both the forested and open lands in his August 16, 1849, report to the New Zealand Company:

*Some four or five miles above the [Parewanui] Reserve, the sand and fern hills end, and the great plain commences...A little below the commencement of the plain a fine stream, called the Tutunui [sic, Tutaenui], joins the Rangitikei, having a run of some 14 miles through the plain, and which would make an excellent natural boundary for sections or blocks; between this stream and the river, to about three miles above their confluence, there is a fine wood consisting of Matahi [sic, Matai], Totara, Rimu, and Taua [sic, Tawa] trees ... although at first sight the plain here seemed wet, it was found to be very dry, notwithstanding the heavy rain which had recently fallen. On examining the bank of the river this was easily accounted for, as under the soil (a black friable mould) the substratum consists of a thick bed of reddish gravel and shingle, forming a natural filter and the banks are at least 30 feet high ... the plain stretches across from the Rangitiki [sic, Rangitikei] to the Turakina in one beautiful flat of about 12 miles by 12 – nearly 100,000 acres – all of the very finest land, and with another fine stream,*

<sup>2</sup> SO 10469 (1850), SO 10586 (1858) and DEED 4 (1865).

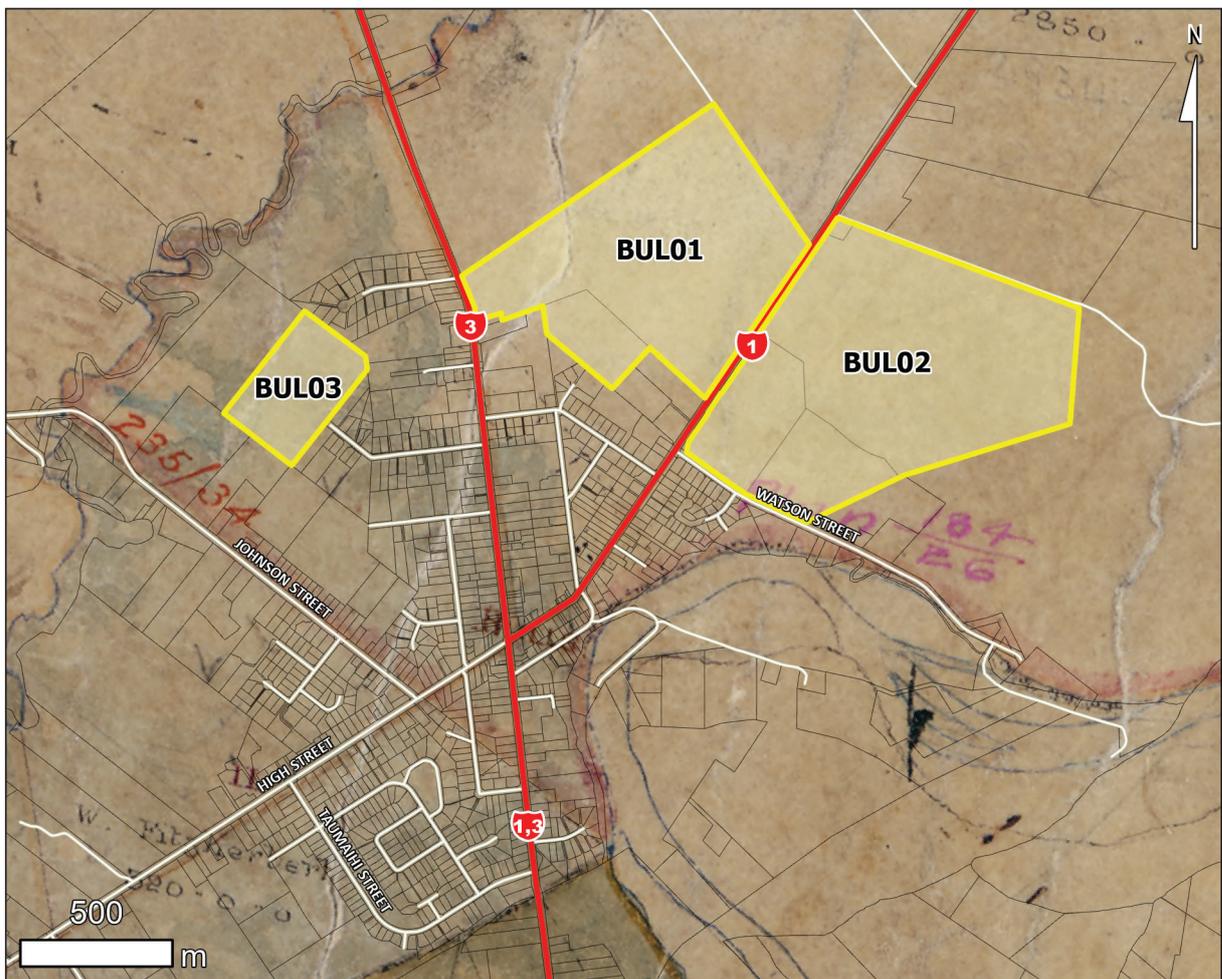


Figure 2: Options for urban growth at Bulls overlaid onto survey plan SO 10586, dated 1858, showing the historic forest coverage (grey-green shading) and small lake / pond near BUL03.

*the Purewa [sic, Porewa], joining the Rangitiki [sic]. About nine miles up, the plain is principally covered with grass, flax, fern, and toe-toe, and with abundance of timber towards the North, and with fine detached woods on the two rivers ... plenty of wild pigs on the plain – ducks, teal, and widgeon on the lakes and rivers – and pigeons and kakas in the bush; and the appearance of the district generally more like what we in England imagined New Zealand to be – ready for the plough – than any place I have yet seen in the country.<sup>3</sup>*

In addition to the ancient stands of forest, historic survey plan SO 10586 (1858) also shows a small lake or pond (unnamed) directly adjacent to BUL03's south-west corner. A shallow depression is visible in the 2005 lidar derived hillshade and the location of this lake / pond is marked by a small stand of mature pines at present (Figure 3). BUL03 was cut by a shallow stream, now straightened, and rushes scattered about the adjacent land on the lower terrace indicate periods of high ground water of temporary inundation.

The forest that once stood at Bulls was gradually cleared as the settlement developed and grew, but photographs taken in the 1880s and 1890s show stands of dense native forest remaining on the outskirts of town or undeveloped sections (Figure 4). However, by the 1940s only scattered and thinning remnants of forest remained along the banks of the Tutaenui Stream and within

<sup>3</sup> 'Rangitikei District' (1849, 17 Oct). Wellington Independent, Vol. V(419), p. 2.



**Figure 3: View looking west along stream / drain running through BUL03 towards a stand of pine trees where a small lake / pond was once present (cf. Figure 2).**



**Figure 4: Scene in Bulls with the business of J. Riley, cabinet maker, taken circa 1880. Of note is the bush, in background, that once stood where the town is now present. (Turnbull Library)**

Bulls an occasional tree saved from the woodman's axe to ornament local gardens. The original extent of the forest is unknown and it is likely that Māori had already cleared a sizeable portion of the forest before the arrival of Pākehā.<sup>4</sup>

Where the native forest survived longest (BUL03), the potential for archaeological sites to be found and the range of potential site-types are both likely to be limited: i.e., small-scale hunting and / or freshwater fishing sites (at the nearby lake / pond), or other sites associated with forest-based activity by Māori. The potential to encounter archaeological sites and the range of potential site types is greater in the open lands (BUL01 and BUL02) but there is nothing in the environmental context to indicate what exactly these may be. Other than at the Rangitikei Race Course, there are no apparent surface features of archaeological interest evident in the lidar derived hillshades.

## HISTORICAL CONTEXT

Historical occupation within the Rangitikei District and more specifically within the Bulls area can be separated into two distinct phases:

- Māori occupation prior to 1849; and,
- Pākehā occupation from 1849 and on.

The two phases are distinguished relative to the first transactions between the Crown and Māori to bring the Rangitikei Purchase into effect. This distinction is not an absolute one: some

<sup>4</sup> See Perry, G. L. W., Wilmshurst, J. M., and McGlone, M. S. (2014). Ecology and long-term history of fire in New Zealand. *New Zealand Journal of Ecology*. Vol. 38(2), p. 157-176.

Pākehā had settled north of the Rangitikei before 1849 and Māori continued to live within the district after. However, the completion of the Rangitikei Purchase marks an inflection point in the dominant occupation patterns and modes of economic activity throughout the district.

### **Māori occupation pre-1849**

As previously noted, historic records for Māori occupation within the Rangitikei Purchase lands and the Bulls area are limited. There are no recorded sites of Māori occupation (i.e., pā / kāinga, cultivation grounds, bird-snaring trees, etc.) within either of the three potential growth areas in historic survey plans or other materials reviewed. A single place name is recorded in two survey plans (SO 10469 and ML 135), though three variant spellings are given: Arataumahi, Te Aro Tumahi, and Taumaihi. This name, in both instances, is located in close proximity to the present State Highway 3 and the 'ara' of Arataumahi may indicate a reference to a Māori track predating the highway on a similar path (Figure 5): one possible literal translation being, "the pathway to work" or "the pathway to the place of work." Survey plans show tracks passing through this area in the period before government roads were formed. These tracks are usually associated with the movements of early European settlers rather than pre-colonial Māori activity, though it is likely that in some instances the 'European tracks' followed existing Māori pathways.

Alternatively, Te Ara Taumaihi (or any of its variants) may have been a Māori name for the general area that was in use before being supplanted by Bulls. Ihakara Tukumarū (Ngāti Ngarongo of Ngāti Raukawa<sup>5</sup>), in a letter published in the Wanganui Herald of 7 March 1868, speaks of a Thomas Williams who "travelled along the [Rangitikei] coast and proceeded to Te Arataumaihi. Thence he went across the country to Oroua."<sup>6</sup> Similarly, a Puru Taone published a notice of discharge of debits in the Wanganui Chronicle of 28 January 1879, giving an address of "Tearataumaihi".<sup>7</sup> And lastly, James Crawford's 1862 sketch of Captain Daniell's homestead at Killeymoon is labelled as "Daniell's, Rangitikei, Te ara taumai".<sup>8</sup> It is possible that the various names refer to both a specific track and a general location but no further information has been found that identifies a specific site or location of potential archaeological interest.

Certain areas of land were reserved by Māori from sale in the Rangitikei Purchase, the Ngāti Apa reserve at Parewanui, down river of Bulls, being the largest. Māori also reserved lands at Bulls, but this was on the flats closest to the river where the best gardening soils were located. In his report to the New Zealand Company, Robert Park wrote that:

*The most part of the [Rangitikei] river bank, for a distance back of 14 to 20 chains, has been reserved by Mr M'Lean [sic, McLean] for the natives for three years, they having their cultivations all along it.*<sup>9</sup>

5 <https://nzhistory.govt.nz/politics/treaty/signatory/8-85>.

6 <https://paperspast.natlib.govt.nz/newspapers/WH18680307.2.7>.

7 <https://paperspast.natlib.govt.nz/newspapers/WC18790127.2.15.3>.

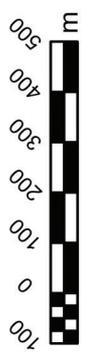
8 <https://natlib.govt.nz/records/22617848>.

9 'Rangitikei District' (1849, 17 Oct). Wellington Independent, Vol. V(419), p. 2.

**Figure 5 (facing page): Overview of potential growth areas showing former lake / pond, wetland and tracks recorded in early survey plans overlaid on to a 1942 aerial orthophoto of the Bulls area. The name Te Ara Taumahi is associated with the Bulls area in early survey plans and correspondence.**



# BULLS GROWTH AREA ASSESSMENTS



-  TRACK / UNFORMED ROAD
-  LAKES AND LAGOONS
-  WETLANDS

James Wilson, in his book on Early Rangitikei, also notes the proximity of Māori settlement to the river:

*Every one of the river flats seems to have had pas, although most of these had beautiful groves of karaka trees, some of which remain to this day. Even by the date we write of, 1849, there was perceptibly fewer of them than there had been. There are evidences that the whole of the bank of the river had been tenanted at various times, and every flat had its own name and history.<sup>10</sup>*

While we do know that Māori occupied the Rangitikei and the Bulls area, there is no specific information pointing to occupation within any of the three potential growth areas from either archaeological or historical sources.

### **Pākehā Occupation post-1849**

The first Pākehā to arrive in the Rangitikei were likely to have been in whalers who resided with local Māori at various stations along the coast before 1840 and by 1849 a small number of families had settled on land with the agreement of Māori owners, among them such names as, Scott, McDonnell, Keir, Winks, Parker, and Glasgow.<sup>11</sup> However, it was not until after the Crown had secured the purchase of the Rangitikei district, in 1849, that Pākehā settlement begin in earnest and “by 1858 the district was well settled.”<sup>12</sup>

The initial Crown subdivision of the Rangitikei Purchase lands did not include a planned settlement at Bulls. In fact, all three of the potential growth areas were originally part of a 2850-acre block purchased by Captain Edward Daniell (SO 10586), what was to become Daniell’s ‘Killeymoon’ homestead that:

*ran from what is now known as the Quarantine Road at the Catholic Chapel, Bulls, from the river at Mr. Flowers’ mill to the Tutaenui, up that stream to the Manuka Bush, as it was called, where Dr. Curl lived so long, and then down to the river, and included some beautiful river flats, which the Hammonds, who bought the property later, called the “Lower Holm.”<sup>13</sup>*

In 1866 Matthew Hammond purchased the now 2,690 acre (1076 ha) Killeymoon from Captain Daniell for £12,000.<sup>14</sup>

James Bull was a carpenter who arrived at Scott’s Ferry in 1858 to build a house for Scott and would later lease 5 acres from Captain Daniell, starting a general store and Post Office in 1859. From these small beginnings the town was born, receiving a further boost in 1868 when 800-acres from the late Captain Daniell’s estate would be subdivided and sold, with reserves for

10 Wilson, J. (1914). Early Rangitikei, p. 44-45.

11 Laurenson, S. G. (1979). Rangitikei: the day of striding out. The Dunmore Press Limited, Palmerston North, p. 27.

12 Rangitikei District Council (accessed 2025, 14 March). History. Rangitikei District Council, website. <https://www.rangitikei.govt.nz/district/about-rangitikei/history>.

13 Wilson, J. (1914). Early Rangitikei, p. 57-59.

14 Melody, P. (2004). The Beach Highway: The Road to Rangitikei from 1849-1875. Paper Plus Marton, Marton.  
Hunt, V. (1987) The “Waitohi” Hammonds.

a cemetery, school, and doctor's residence.<sup>15</sup> An early attempt to promote the name 'Clifton' was overcome the town formally took on the name 'Bulls' in recognition of James Bull and his significant contribution to the towns founding and development. Nearing the turn of the century, the 1897 Cyclopaedia of New Zealand, Wellington Volume, described Bulls as:

*a population of 521 souls, two churches, a State school, post and telegraph office, three hotels, and is the market town for the farming, agricultural, and dairying settlements lying to the north, south, and west. There is little to interest the tourist hereabout, but the land grows rich grass, and good crops of grain.*

All three of the potential growth areas lie outside the historic residential boundary of the Bulls township and therefore there is low (though not nil) potential for archaeological sites associated with Pākehā residential occupation. However, even with the limited research to date, there are already a small number of known and potential archaeological sites that RDC and potential developers should be aware of, and discussed below.

## KNOWN AND POTENTIAL ARCHAEOLOGICAL RISKS

The known or potential archaeological risks for each of the proposed growth areas are addressed separately, as below.

### **BUL01**

There are no known Māori or Pākehā archaeological sites within this area. However, BUL01 is part of a larger cadastral parcel that contains the site of the formal 'Killeymoon' home.<sup>16</sup> The site of Captain Daniell's, and later Matthew Hammond, home is outside the BUL01 area, but historic aerial photographs show a small villa situated within BUL01 that could be of pre-1900 origin and other archaeological sites associated with the historic occupation could be present (Figure 6).

### **BUL02**

There are no known Māori archaeological sites within this area, but there are two known archaeological sites associated with Pākehā occupation that affect a substantial portion of the BUL02 area (Figure 7).

The lesser of the two sites is the polo ground, located in the south west with street frontage to SH1 and Watson Street. Newspaper records indicate the Rangitikei Polo Club was formed some

15 'Valuable Land for Sale in Central Rangitikei' (1868, 14 May). Wanganui Chronicle, p. 2. Available at: <https://paperspast.natlib.govt.nz/newspapers/WC18680514.2.14.2>.

'Rangitikei Stations and their Produce' (1876, 19 April). Wanganui Herald, p. 2. Available at: <https://paperspast.natlib.govt.nz/newspapers/WH18760419.2.13>.

16 This is not the first house built by Captain Daniell's at 'Killeymoon'. Historic records indicate at least one earlier structure located in the vicinity of Daniell's Street within the present urban extent of Bulls.

**Figure 6 (following page): Detail of the BUL01 option area overlaid on to the 1942 aerial orthophoto with features of archaeological or potential archaeological interest labelled.**

**Figure 7 (following facing page): Detail of the BUL02 option area overlaid on to the 1942 aerial orthophoto with features of archaeological or potential archaeological interest labelled.**

'KILLEYMOON' HOMESTEAD

TUTAENUTI STREAM

3

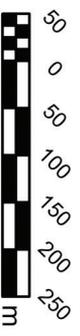
1

**BULO1**

PRE-1900 HOUSE?

**BULO3**

**BULO2**



**BULLS GROWTH AREA 01**

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ARCHAEOLOGY & HERITAGE  
MANAGEMENT SERVICES





**BUL01**

**BUL02**

1890 GRAND STAND

1870S GRAND STAND?

STABLES / STALLS

RANGITIKEI JOCKEY CLUB  
RACE COURSE

POLO GROUND

STABLES

1

WILSON STREET

DANIELL STREET

WATSON STREET

3



**BULLS GROWTH AREA 02**



time prior to 1891 and that club matches held on 16.5-acres of land leased from the Hammond family. The grounds were eventually purchased by the polo club in 1908.<sup>17</sup> A small stand is present on the property and does not appear to be of pre-1900 origin (though earlier sheds on the site may have been), but the polo field is an archaeological site.

Historical records indicate that horse races were first held at Bulls (then referred to as Lower Rangitikei) about 1857, with the Marton – Rangitikei Jockey Club (later renamed, Rangitikei Racing Club in 1886) established sometime after and the racing club is recognised as one of the oldest in New Zealand.<sup>18, 19</sup> Like the polo club, the land for the race course was initially leased from the Daniell and Hammond families and purchased from the Hammond estate in 1908. Newspaper articles refer to at least two grand stands:

*The 1874 meeting of the Marton-Rangitikei Jockey Club is now a record of the past... The ladies assembled in fair numbers, and made a pretty picture of the Grand Stand, the colors of the varied and elaborate costumes blending admirably together. Under the Grand stand Mr Watkins, of Parawanui, attended to the creature comforts of all and sundry with a lavish profusion of the good things of this world... The thriving township of Bulls presented a very lively appearance. ('Marton-Rangitikei Races', Wanganui Herald, 5 February 1874)<sup>20</sup>*

*Mr Hammond has a good thing on with the Rangitikei Jockey Club as he nobbles no less than £75 for the use of his racecourse – half the money the gate sold for. The Club has erected a very fair Grand Stand, capable of holding 300 visitors.... ('Sporting', Wanganui Herald, 21 December 1877)<sup>21</sup>*

*Tenders are invited until 4 p.m. on MONDAY, the 21st inst., for the erection of a Grand Stand for the Rangitikei Jockey Club. Plans, etc., at Mr C. W. Macleans offices, Bulls.... ('To Builders', Wanganui Herald, 9 July 1890)<sup>22</sup>*

*Visitors who were present at the Bulls races speak in praiseworthy terms of the new grand stand, lately erected by the Rangitikei Jockey Club. The structure is a very handsome one and capable of accomodating [sic] a large number of people. Mr A. Atkin's was the architect and has carried out his work in a most praiseworthy manner, the design of the building making it one of the best grandstands in the colony. ('Local and General', Wanganui Chronicle, 3 January 1891)<sup>23</sup>*

Historic aerial photographs suggest that both the old (1870s) and new (1890) grand stands had survived to the mid-twentieth century (Figure 7), the 1890 grand stand being fortunate to

17 Wilson, R. A. (n.d.). Bulls: A History of the Township. p. 14.

18 'untitled' (1886, 4 September). Wairarapa Daily Times. p. 2, available at: <https://paperspast.natlib.govt.nz/newspapers/WDT18860904.2.6>.

19 <https://awapuniracing.co.nz/our-history>.

20 <https://paperspast.natlib.govt.nz/newspapers/WH18740205.2.10>.

21 <https://paperspast.natlib.govt.nz/newspapers/WH18771221.2.12>.

22 <https://paperspast.natlib.govt.nz/newspapers/WH18900709.2.28.5>.

23 <https://paperspast.natlib.govt.nz/newspapers/WC18910103.2.7>.

have been saved from destruction by fire in 1938.<sup>24</sup> Historic aerial photographs also suggest that the 1890 grand stand survives, in part, within the fabric of the current grand stand. On the evidence reviewed to date, both grandstands (standing and former site of), race track, and potentially some of the stables / stalls (as present in aerial photographs), are an archaeological site.

The stables facing Watson Street appear to be of early twentieth century origin, but further research should be undertaken to confirm this.

### **BUL03**

There are no known archaeological sites of either Māori or Pākehā origin within this property. Survey plans SO 10469 and DEED 4 show a track, referred to as Bell's Road', crossing this property: the track presumably follows the terrace above the stream (now drain) the passes through the lower lying land and drained into the former pond directly west of the BUL03 area (Figure 5).

## CONSENTING / MANAGEMENT ADVICE

### **BUL01 and BUL03**

There is a low level of archaeological risk for both BUL01 and BUL03. BUL03 presents a nearly negligible level of archaeological risk, there being no known or potential archaeological sites in BUL03, and the residual low level unknown archaeological risk could reasonably be managed via an archaeological discovery protocol ("**ADP**") with earthworks monitored by local iwi kaitiaki. Further research is necessary to determine the temporal origin of the former villa / house situated in BUL01 and if found to be of pre-1900 origin an archaeological authority would be required for any works in this area. Alternatively, if the villa / house site was to be avoided (perhaps incorporated into a reserve / park area) an archaeological authority would not be required and the residual low level unknown archaeological risk could also be managed via an ADP with earthworks monitored by local iwi kaitiaki.

While BUL01 and BUL03 appear to be largely without archaeological risks, potential developers should bear in mind that the absence, or near absence, of known and potential archaeological sites does not preclude the possibility that unknown archaeological sites may be present. The Heritage New Zealand Pouhere Taonga Act (2014) protects all archaeological sites from damage and destruction regardless of whether:

- (a) The site is recorded in the New Zealand Archaeological Association Site Recording Scheme or included in the Heritage New Zealand List;
- (b) The site only becomes known about as a result of ground disturbance; and / or,
- (c) The activity is permitted under a district or regional plan, or a resource or building consent has been granted.

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<sup>24</sup> <https://paperspast.natlib.govt.nz/newspapers/ESD19380311.2.142>.

Developers should consider the potential impact, in terms of time and cost, that an unexpected archaeological discovery may have on their works and may wish to pre-emptively apply to Heritage New Zealand Pouhere Taonga (“**HNZPT**”) for an archaeological authority to streamline the response should such a discovery occur.

## **BUL02**

There are two known archaeological sites with a number of components that affect a substantial proportion of the BUL02 area, these being: the polo ground, and the Rangitikei Racing Club (Figure 7). An archaeological authority from HNZPT will be required for any development works in these areas but this would not be a significant barrier to the future development of the BUL02 area.

The polo ground is the simpler of the two sites and archaeological remains are likely to be limited (nothing is expected of the ground itself, but there may be on-site rubbish pits or other features of minor extent associated with game day activities. Any future development within the polo ground should address the historic character through the use of sympathetic naming for roads and other development features, interpretative signage and / or artwork.<sup>25</sup>

The Rangitikei Racing Club is the more substantial and significant of the two known archaeological sites, being one of the earliest race courses established in New Zealand. Both the physical race-track and its buildings (and former building sites) are archaeological sites: buildings and structures post-dating 1900, which are not archaeological sites, are also covered by Resource Management Act 1991 (“**RMA**”) provisions that protect “historic heritage from inappropriate subdivision, use, and development.” As with the polo grounds, development within the race course grounds should be undertaken in a manner sympathetic to the historic character of the site when considering design, naming, and interpretative signage or artwork. In particular, preservation of the race course alignment via a loop-road and pedestrian footpath would be an appropriate repurposing of this historic feature.<sup>26</sup>

Buildings and structures at the race course may be able to preserved or reused for private or community purposes, as historic monuments or features of interest. A formal heritage assessment should be undertaken of the standing buildings / structures to evaluate their architectural heritage values and the level of archaeological documentation that may be required if any buildings or structures are to be demolished as part of a future development. Archaeological excavations may be also be required and a geophysical survey may be helpful to either identify or avoid areas requiring formal archaeological investigation.

An archaeological authority is unlikely to be required for any development within area of the stables adjacent to Watson Street, but other protections under the RMA may apply.

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25 Sympathetic naming may draw upon historic references to the site, and / or significant personalities or events associated with the site history.

26 Depending the character of any development, a shared pedestrian and horse path may be appropriate (i.e., see shared use paths alongside the Mackay’s to Peka Peka highway).

## CONCLUSION

Three areas are being considered for future residential growth at Bulls. Historic records suggest that two of these areas – BUL01 and BUL03 –have a negligible or low archaeological potential. There are no known archaeological sites within BUL03 and this area could be developed with relatively little risk of disruption due to unknown archaeological discoveries. One potential archaeological house site has been identified within BUL01 and further research should be undertaken to determine if it is an archaeological site; alternatively, this location could be avoided / reserved from any future development. Both BUL01 and BUL03 areas could be developed with archaeological matters managed by an ADP,<sup>27</sup> but developers should consider the potential convenience of this approach against the potential disruption and cost of an unexpected archaeological discovery.<sup>28</sup>

There are two known archaeological sites within the BUL02 growth area, of which the Rangitikei Racing Club grounds, buildings and structures is the more significant. The presence of archaeological sites – including the significant early race course – is not a fatal flaw that would rule out future development, but aspects of design, naming, interpretative signage and / or artwork of any future development should be sympathetic to the historic character of the area. However, the presence of the archaeological sites does introduce some additional cost and statutory obligations that are not associated with the BUL01 and BUL03 growth areas. Further detailed investigation and research would be required prior to applying for an archaeological authority to undertake development works within this area.

Overall, the proposed growth areas, their known or potential archaeological risk, further requirements and appropriate management methods are summarised in the following table:

**Table 1: Summary table of potential growth areas, known archaeology, unknown archaeological potential and recommendations for appropriate management of potential effects on archaeological sites.**

GROWTH AREA	KNOWN ARCHAEOLOGY	UNKOWN ARCHAEOLOGY	ADP APPROPRIATE	ARCHAEOLOGICAL AUTHORITY
<b>BUL01</b>	No (possible pre-1900 villa / house)	Yes (Low level risk)	Yes	Optional
<b>BUL02</b>	Yes (polo grounds, Rangitikei Racing Club)	Yes (Low level risk)	No	Required
<b>BUL03</b>	No	Yes (Low level risk)	Yes	Optional

<sup>27</sup> Assuming the villa / house site in BUL01 is confirmed to post-date 1900, or the site is avoided entirely in any future development.

<sup>28</sup> From the date of its receipt by HNZPT, an archaeological authority application is usually processed and a decision returned within a 30 working-day period. After an archaeological authority is received by an applicant, there is a compulsory 15 working-day stand-down period that must be observed before the authority can be actioned and allows time for any third-party objections that might be raised to the granting of the authority. Further time would be required to prepare the archaeological assessment report and other documentation to support the authority application.