

23 September 2025

██████████  
Sent via email to ██████████

**LG25-0257 - ██████████ Research on Sites and Areas of Significance to Māori**

Dear ████████,

**REQUEST FOR OFFICIAL INFORMATION – RELEASE OF INFORMATION**

Thank you for your request for information held by the Queenstown Lakes District Council (QLDC). On 1 September 2025 you requested the following information under the Local Government Official Information and Meetings Act 1987 (LGOIMA):

We are undertaking research on behalf of the ██████████ on Sites and Areas of Significance to Māori (SASMs). The key objective of our analysis is to identify the scale and spread across the country of the use of SASMs and the types of sites/areas for which this mechanism is currently in use.

1. Does your Council recognise SASMs (or an equivalent mechanism) in your planning instruments and/or in a non-regulatory way?
2. How many SASMs are currently recognised in your district/region?
3. Please share with us any information you can on where they are located (including any maps you have) and information on whether (and if possible, how many) you have any SASMs on a closed register. Please provide any information you can on the SASMs you hold information on.
4. What types of SASMs are currently recognised by your council? E.g., wāhi tapu, wāhi tūpuna, statutory acknowledgement areas, urupā, pā, cultural resources, cultural landscapes, natural features etc.
5. How many SASMs are land-based, water-based, or are across both land and water?
6. What are the potential implications associated with the recognition of SASMs in your district/region? E.g., are there any tikanga requirements, additional controls on development, special requirements for earthworks, water-takes, building etc.
7. What processes and areas of your Council use SASMs?
8. What is the rationale and evidence used to support the use of SASMs in these processes?
9. What rationale and evidence base does your Council use when considering whether a SASM should be recognised in your council processes?

**10. Are there any other relevant statistics or other information relating to SASMs that you can provide that would help us understand how and why SASMs are recognised by your council in your district/region?**

**QLDC RESPONSE**

**Release of information**

In response to your request, we consulted with the QLDC Planning Policy Team.

Please note that this document uses Kāi Tahu dialect, where in the south of the South Island, the local dialect uses 'k' interchangeably with 'ng'. For clarity, please see [Chapter 2 of PDP](#) – Glossary 2.3 where both dialects are acknowledged.

**1. Does your Council recognise SASMs (or an equivalent mechanism) in your planning instruments and/or in a non-regulatory way?**

[Chapter 39 - Wāhi Tūpuna](#) of the Proposed District Plan (PDP) sets out Wāhi Tūpuna, being the landscapes and places that embody the relationship of Manawhenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.

Most of the Statutory Acknowledgement Areas in the district under the Ngāi Tahu Claims Settlement Act 1998 (NTCSA) are included within the Wāhi Tūpuna listed in Schedule 39.6. In addition, there are three tōpuni (named after the Tōpuni cloak worn by Ngāi Tahu rangatira): Tititea (Mt Aspiring), Pikirakatahi (Mt Earnslaw) and Te Koroka (Dart/Slipstream). These are acknowledged within [Chapter 5 of the PDP](#).

As a result of a staged Proposed Plan process, there are areas that have been identified by Kāi Tahu as wāhi tūpuna; however, the overlay could not be reasonably applied to the Operative District Plan (ODP) zoned land that was awaiting inclusion of future stages of the PDP. These areas are therefore not formally afforded the recognition or protection of those areas identified within the PDP.

Work is currently underway on a plan change to include these remaining ODP areas into the PDP, although this may be impacted by 'Plan Stop' if exemptions are not granted. Access to GIS maps of these areas can be provided if required. These areas are all part of, or extension to, existing recognised wāhi tūpuna within the PDP.

**2. How many SASMs are currently recognised in your district/region?**

Schedule 39.6 identify a total of 48 wāhi tūpuna.

A further 3 Tōpuni are recognised.

**3. Please share with us any information you can on where they are located (including any maps you have) and information on whether (and if possible, how many) you have any SASMs on a closed register. Please provide any information you can on the SASMs you hold information on.**

Schedule 39.6 sets out the name, description, Manawhenua values and potential threats of each wāhi tūpuna.

There are no wāhi tūpuna or SASMs on a closed register.

The [PDP](#) maps include an overlay showing the geographical extent of these areas. To view the overlay, go to Map Tools>Map Layers>Proposed District Plan 2015>Overlays>wāhi tūpuna.

**4. What types of SASMs are currently recognised by your council? E.g., wāhi tapu, wāhi tūpuna, statutory acknowledgement areas, urupā, pā, cultural resources, cultural landscapes, natural features etc.**

- Kāika
- Mahika kai
- Nohoaka
- Tūāhu
- Mauka
- Awa
- Wāhi tapu
- Wāhi taoka
- Ara tawhito
- Urupā
- Tauraka waka
- Sites with connection to Pounamu
- Sites with Archaeological values
- Tōpuni

**5. How many SASMs are land-based, water-based, or are across both land and water?**

All sites span both land and water. The majority are connected to the lakes and rivers of the district. For Kāi Tahu, the relationship between land and water is deeply interwoven, expressed as - *ki uta ki tai*- from mountains to the sea

For example, all rivers identified include areas along the banks as part of 'ara tawhito (ancient pathways)'.

**6. What are the potential implications associated with the recognition of SASMs in your district/region? E.g., are there any tikanga requirements, additional controls on development, special requirements for earthworks, water-takes, building etc.**

Schedule 39.6 sets out potential threats to the values of each wāhi tūpuna. Where any of these activities require a resource consent this directs consideration to be given to these values. This may be through obtaining affected party approval or obtaining a cultural impact assessment.

Some activities within an identified wāhi tūpuna are permitted provided they meet standards – these include:

- Earthworks
- Farm buildings
- Structures associated with energy and utility activities
- Buildings

Where standards are not met, a resource consent would be required.

QLDC has prepared a practice note that summarises and sets out the implications of wāhi tūpuna in more detail: [QLDC Practice Note Sept25](#)

In developed urban areas – such as Central Wānaka/Take Kārara, central Queenstown/Tāhuna, and urban Frankton/Te Kirikiri- an approach that recognises the extent of existing modification is taken. Objectives and policies seek to ensure Kāi Tahu presence within the built environment.

For example, Strategic Objective 5.4.2, and [Part Three: Urban Environment Chapter 13 Wānaka Town Centre](#) Objective 13.2.2.4 seek to incorporate references to tangata whenua values in public space design.

## **7. What processes and areas of your Council use SASMs?**

The wāhi tūpuna are identified within the PDP.

## **8. What is the rationale and evidence used to support the use of SASMs in these processes?**

QLDC worked closely with Kāi Tahu in preparing its strategic approach to Tangata Whenua as part of Stage 1 of the PDP. This collaboration resulted in the inclusion of relevant content in Chapter 3: Strategic Approach and Chapter 5: Tangata Whenua. The strategic approach includes objectives and policies that outline the need to identify and protect values associated with wāhi tūpuna.

Further work continued in Stage 3 of the PDP during which Kāi Tahu provided the specific areas to be identified as Wāhi Tūpuna. They provided detailed descriptions, associated cultural values and potential threats to those areas. A Schedule 1 process was undertaken to formally introduce Chapter 39 into the PDP.

While the National Planning Standards for *Sites of Significance to Māori* were not directly adopted, an approach consistent with the intent and structure of those standards was implemented.

## **9. What rationale and evidence base does your Council use when considering whether a SASM should be recognised in your council processes?**

All information relating to the wāhi tūpuna plan change is viewable on the QLDC website, including the evidence basis for the plan change. Specific links provided below:

- [Chapter 39 Wāhi Tūpuna S32](#)
- [Stream 16 - Wāhi Tūpuna hearing information](#)
- [Decision: QLDC Stage 3 Report 20.2 - Wāhi Tūpuna with Appendix 1 Chapter 39 & QLDC Stage 3 Report 20.](#)
- [2022-10-06 Consent Order – Topic 34 – Wahi Tupuna](#)
- [2023-09-19 Consent Order Topic 34 Wāhi Tūpuna - RPL & QPL](#)

**10. Are there any other relevant statistics or other information relating to SASMs that you can provide that would help us understand how and why SASMs are recognised by your Council in your district/region?**

QLDC currently has limited data or statistics relating to wāhi tūpuna due to the relatively recent introduction of Chapter 39 into the PDP.

QLDC has a strong recognition of Kāi Tahu, reflected in its overarching strategic approach. This interrelates and influences all areas, but is specifically directed by strategic approaches of living Te Ao Māori and Mātauraka Kāi Tahu - “Outcomes are considered from the perspective of Kāi Tahu & measured based on what is important to them” (QLDC Strategic approach - [Our Strategic Framework | Queenstown Lakes District Council](#))

The relationship between Kāi Tahu and QLDC is further outlined in [Chapter 3 Strategic Direction](#) and [Chapter 5 Tangata Whenua](#) of the PDP, including the identification and protection of values for wāhi tūpuna.

We trust that the above information satisfactorily answers your request.

Kind regards,



Democracy Services Team  
Corporate Services | Queenstown Lakes District Council  
P: +64 3 441 0499  
E: [informationrequest@qldc.govt.nz](mailto:informationrequest@qldc.govt.nz)