

Archaeological Assessment of the Proposed Punakaiki Wild Lodge and Cabins Development at Perpendicular Point, Te Miko, Punakaiki (ACG Properties Limited)



Prepared for ACG Properties Limited

Punakaiki Wild Development: Archaeological Assessment

Cover Photograph: View overlooking Perpendicular Point, Te Miko, Punakaiki, looking westward.

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Disclaimer and Limitations

This report is an archaeological assessment report prepared by South Island Archaeology (SIA) for ACG Properties Limited (the Client) in relation to the proposed Punakaiki Wild lodge and cabins development at Perpendicular Point, Te Miko, Punakaiki. It has been prepared for the sole purpose of presenting the results of an archaeological assessment of the project area. The report should be read in light of its specific subject, scope, and assumptions, and it cannot be relied upon for any purpose other than that described. This report does not provide statements on mana whenua interests, nor does it seek to identify or assess cultural values associated with the project footprint.

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1. Introduction

1.1. Purpose of Report

South Island Archaeology (SIA) was commissioned by ACG Properties Limited to prepare an archaeological assessment for the proposed Punakaiki Wild lodge and cabins development at Perpendicular Point, Te Miko, Punakaiki (Figure 1). The project involves construction of a luxury lodge (with restaurant, bar and spa facilities), fifteen self-contained accommodation cabins, a worker accommodation building, and a lodge support/utility building, together with associated access, infrastructure, parking, earthworks, and ecological restoration planting across the c. 20 ha site.

This report presents an archaeological assessment of the project footprint and provides recommendations to manage archaeological risk. Its purpose is to assess the likelihood of the works impacting recorded or unrecorded archaeological features—particularly given the proximity of recorded site K30/7 (a cave/rock shelter with ovens, artefacts, and midden material) and the wider Te Miko coastline, which is identified as a Site of Significance to Māori (SASM 30) with known ara tāwhito (travel route) values. The assessment has been prepared to inform the resource consent process and to address matters raised in submissions by Heritage New Zealand Pouhere Taonga (HNZPT) and the Department of Conservation (DOC).



Figure 1. Map showing the proposed development site at Perpendicular Point, Te Miko, Punakaiki (yellow polygon). Also shown is Punakaiki, SH6 alignment on east side of development site, and the approximate location of recorded site K30/7 (a cave/rock shelter with ovens, artefacts, and midden material) and the wider Te Miko coastline. Source: Grip 2025.

1.2. Location, Background, & Proposed Works

ACG Properties Limited proposes to develop a new luxury accommodation facility, known as *Punakaiki Wild*, on a 20 ha property at Perpendicular Point, Te Miko, Punakaiki (Figure 2–4). The site is located at 4663 State Highway 6 (Valuation Ref: 18860/28400), directly north of reserve land associated with Paparoa National Park and the Truman Track.

Project Overview: The development comprises:

- A luxury lodge (including restaurant, bar, and spa facilities).
- Twelve self-contained accommodation cabins.
- A worker accommodation building.
- A lodge support and utility building.
- Associated access roads, parking, infrastructure, and service networks.
- A programme of ecological restoration planting and management across the property.

Setting and Land Use History: The property occupies elevated ground above the limestone and karst cliffs of the Te Miko coastline. It has been subject to a long history of pastoral use, including stock grazing and scrub clearance, undertaken by both the current and former landowners. The southern boundary adjoins mature coastal forest and conservation land within Paparoa National Park. The coastal edge is steep and inaccessible, limiting direct interaction with the shoreline.

Design Approach and Construction Methodology: The project adopts a low-density, eco-lodge model, with lightweight cabin designs and service routes making use of existing farm tracks where possible. Proposed earthworks will involve cut and fill to establish building platforms, accessways, and infrastructure, estimated at c. 3,365 m³ cut and 2,470 m³ fill, with maximum depths of up to 2.5 m. The most substantial earthworks relate to new roading and access formation. Services (water supply, solar power, septic systems, and communications) will be provided through a combination of localised infrastructure and centralised lodge utilities.

Constraints and Heritage Context: The site lies within an area of high natural and cultural values:

- To the west, recorded archaeological site K30/7 (a large cave/rock shelter with ovens, artefacts, and midden material) lies along the coastal margin.
- The wider project footprint is encompassed by *Site of Significance to Māori (SASM 30 – Te Miko)* under the Proposed Te Tai o Poutini Plan, which records ara tāwhito (traditional travel routes) and occupation values.
- The property is also located within the Paparoa Character Area, recognised in the Operative Buller District Plan as a distinctive coastal environment requiring careful management of landscape and cultural values.

Purpose and Benefits: The development seeks to provide a high-end, low-density accommodation offering that reflects the rugged natural character of the West Coast environment. In addition to tourism and economic benefits, the project will deliver significant ecological restoration outcomes, with active regeneration planting across approximately half of the property.

Legal Alignment and Land Parcels: The property is legally described as Part Section 1 Block IX Brighton SD (full legal title to be confirmed). Access is provided from State Highway 6. The proposed works also extend into the SH6 legal road reserve where access improvements are required.

Iwi Engagement and Accidental Discovery Protocol: During the public notification process, Te Rūnanga o Ngāti Waewae — through Poutini Environmental — provided their Accidental Discovery Protocol (2023) and requested that it be adopted for the project. This protocol was provided before completion of this Archaeological Assessment. The ADP is appended to this report (Appendix 1) and referred to in Section 10.3.

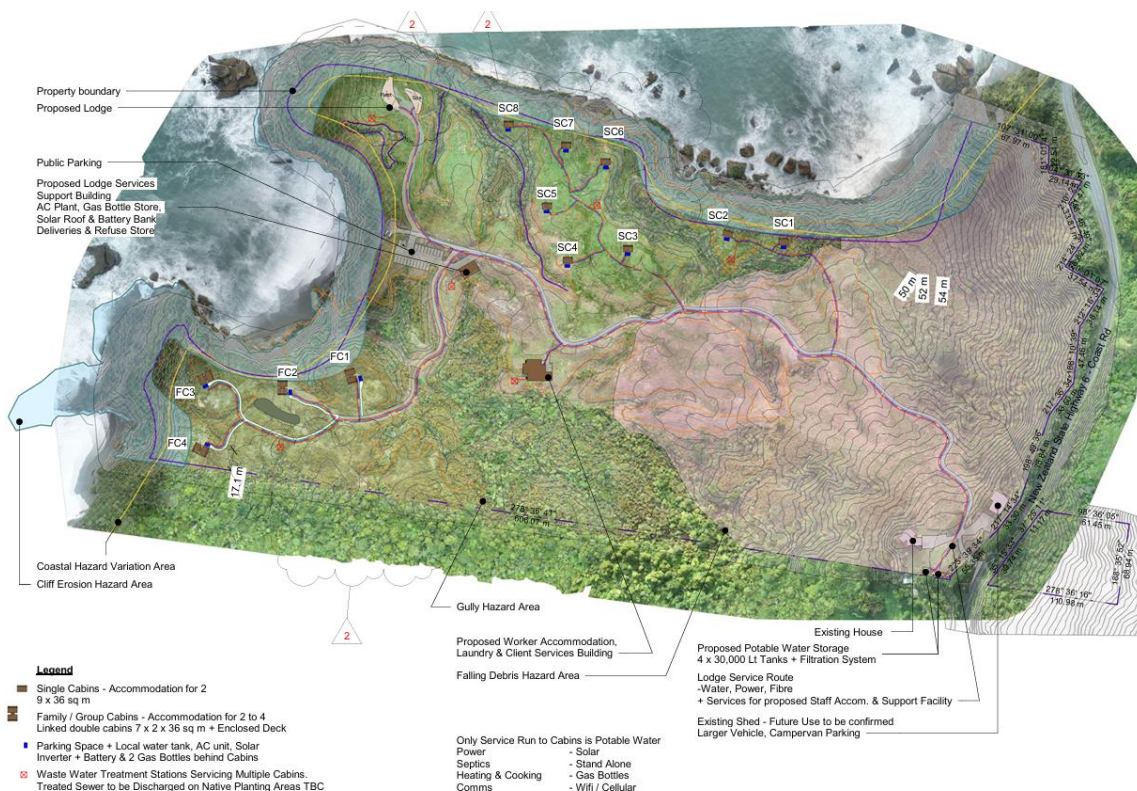


Figure 2. Site plan showing the property boundary, proposed lodge, cabins (single and family/group), worker accommodation, support and service buildings, parking areas, potable water storage, and associated infrastructure. Key hazard zones (coastal hazard variation, cliff erosion, gully, and falling debris) are indicated, alongside existing site features such as the house and shed. Source: Client Supplied.

2. Statutory Requirements

There are two main pieces of legislation in New Zealand that control work affecting archaeological sites. These are the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) and the Resource Management Act 1991 (RMA). The heritage places under consideration in this report and the timeframe/age of these places is restricted to archaeological sites as defined in the HNZPTA.

2.1. The Heritage New Zealand Pouhere Taonga Act 2014

Heritage New Zealand administers the HNZPTA. It contains a consent (authority) process for any work affecting archaeological sites, where an archaeological site is defined as:

- Any place in New Zealand, including any building or structure (or part of a building or structure), that: Was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and
- Provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and
- Includes a site for which a declaration is made under section 43(1).

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Any person who intends carrying out work that may modify or destroy an archaeological site, must first obtain an authority from Heritage New Zealand. The process applies to sites on land of all tenure including public, private and designated land. The HNZPTA contains penalties for unauthorised site damage or destruction.

The archaeological authority process applies to all archaeological sites, regardless of whether:

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

Heritage New Zealand also maintains the New Zealand Heritage List/ Rarangi Korero of Historic Places, Historic Areas, Wahi Tupuna, Wahi Tapu and Wahi Tapu Areas. The List can include archaeological sites. Its purpose is to inform members of the public about such places.

2.2. The Resource Management Act 1991

The RMA requires City, District and Regional Councils to manage the use, development, and protection of natural and physical resources in a way that provides for the wellbeing of today's communities while safeguarding the options of future generations. The protection of historic heritage from inappropriate subdivision, use, and development is identified as a matter of national importance (Section 6f).

Historic heritage is defined as those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, derived from archaeological, architectural, cultural, historic, scientific, or technological qualities. Historic heritage includes:

- historic sites, structures, places, and areas;
- archaeological sites;
- sites of significance to Māori, including wāhi tapu;
- surroundings associated with the natural and physical resources (Section 2).

These categories are not mutually exclusive, and some archaeological sites may include above ground structures or may also be places that are of significance to Māori. Where resource consent is required for any activity an assessment of effects is required to address cultural and historic heritage matters (RMA 4th Schedule and the district plan assessment criteria).

3. Methodology

This report is based on desk-top research and a site visit. Research was carried out using a range of historic and archaeological/cultural information sources including:

- New Zealand Archaeological Association (NZAA) Site Record Database (ArchSite).
- The Heritage New Zealand Pouhere Taonga (HNZPT) List/Rārangi Kōrero.
- Kā Huru Manu, the Cultural Mapping Project by Ngāi Tahu.
- Archaeological/cultural reports associated with the area.
- LINZ survey plans, historic maps and photographs from various sources.
- Historic newspapers (Papers Past website).

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- Archive New Zealand records via ArchWay.
- Engineering New Zealand's online Heritage Register.
- New Zealand History's online Memorial Register.
- The New Zealand Tree Register.
- Operative Buller District Plan (2000, as amended).

A site visit was undertaken by TJ O'Connell of South Island Archaeology (SIA) on 1 September 2025. No below ground investigations occurred as part of this visit.

The assessment of archaeological values was based on a consideration of the impacts of the proposed works on known and potential archaeological/cultural sites in the project footprint. These sites were characterised using the archaeological values of condition, rarity, contextual values, information potential, amenity value and cultural associations. This was done in accordance with the HNZPT guidelines.

3.1. Constraints and Limitations

This report is an archaeological assessment of the project area. Statements are made as to the location and nature of archaeological sites, and their archaeological values.

There are no statements on the Māori cultural significance of the project area, nor are the views of Tangata Whenua represented in this report. An assessment of cultural significance will not necessarily correlate with an assessment of the archaeological significance of the area.

4. Physical Environment/Setting

The project area is located at Perpendicular Point, Te Miko, Punakaiki, on the northern West Coast of the South Island. The c. 20 ha property lies immediately north of reserve land associated with Paparoa National Park and the Truman Track, with the Tasman Sea to the west and State Highway 6 providing access along the eastern boundary. The property sits within a wider coastal environment of high natural, cultural, and landscape values (BDC 2024).

Topography & Land Cover: The site occupies elevated ground above the dramatic karst and limestone cliffs of the Te Miko coastline (HNZPT 2025). Land cover is a mix of open pasture, regenerating scrub, and patches of exotic grassland reflecting its historic use for stock grazing and clearance. The southern margin adjoins intact coastal forest associated with Paparoa National Park, while the western edge is defined by steep coastal cliffs and a sea cave (DOC 2025). Shelterbelts and remnant fences indicate earlier farm use, though the overall setting retains a rugged, undeveloped character.

Hydrology: The property contains several ephemeral streams and gullies draining westward toward the cliff margins, with localised wetland and riparian shrubland identified in ecological surveys (DOC 2025). Permanent surface waterbodies are absent within the property, although the site sits immediately above the coastal edge where natural drainage converges at cliff faces. To the south, the Paparoa National Park includes a network of coastal streams, wetlands, and karst drainage features (BDC 2024).

Geology / Soils (General): The landform reflects the underlying limestone and sandstone geology of the Paparoa Range margin, with karst features (caves, overhangs, and solution gullies) prominent in the wider area (Gage & Suggate 1958; McSaveney 2010). Surface soils include shallow, rocky substrates overlying weathered sedimentary bedrock, with pockets of deeper colluvial deposits along

lower slopes and gullies (Rattenbury et al. 1998). Coastal erosion processes are active at the cliff edge, creating unstable margins prone to rockfall and slope retreat (HNZPT 2025).

Existing Infrastructure & Access: Existing improvements are limited to farm tracks, fences, and small sheds associated with historic pastoral use (HNZPT 2025). State Highway 6 forms the eastern boundary and provides vehicular access to the site. The proposed development will utilise and upgrade sections of the existing farm track network to service the lodge and cabins (DOC 2025). No formed access currently exists to the coastal edge, which remains steep and largely inaccessible.

5. Historical & Archaeological Background

5.1. Māori History

The Punakaiki coastline, including Perpendicular Point (Te Miko), lies within an area of longstanding Māori occupation and use. The West Coast formed a key part of the wider Ngāi Tahu customary landscape, with coastal settlements, mahinga kai sites, and ara tāwhito (traditional travel routes) connecting along the shoreline and through inland passes to Kā Tiritiri-o-te-Moana (Southern Alps) and beyond (BDC 2024). The corridor between Māwhera (Greymouth) and Kawatiri (Westport) was especially significant for the movement of people and resources, particularly the highly valued pounamu sourced from Te Tai Poutini and traded throughout Aotearoa (Anderson 1998).

Māori have lived in the wider West Coast area since prior to European arrival. Archaeological, oral and historical evidence shows that settlements were located along the whole length of the coast, particularly near lagoons and river mouths where forest, bird, shellfish, and freshwater resources were abundant (Nathan 2002). Mahinga kai included fish, shellfish such as mussels and pipi, seabirds, tuna (eel), and plant resources such as aruhe (fern root). The availability of pounamu made the region especially important: by the late 1300s it was being quarried in river valleys such as the Arahura and transported throughout the country (Anderson 1998; Te Ara 2012).

Ara Tāwhito and Mahinga Kai: Perpendicular Point (Te Miko) is recorded as part of SASM 30 in the Proposed Te Tai o Poutini Plan, which identifies the area for its ara tāwhito values (BDC 2024). The cliffs and caves of this section of the coast were historically associated with travel, temporary occupation, and food-gathering despite the steep and hazardous terrain (HNZPT 2025). Seasonal harvesting of fish, shellfish, and seabirds would have been an important activity, while inland routes linked the coast to valleys and passes providing access to mahinga kai resources such as tuna (eel), aruhe (fern root), and native birds (DOC 2025).

Recorded Archaeological Sites: The New Zealand Archaeological Association (NZAA) ArchSite records several sites in the vicinity of the project area. Of most direct relevance is K30/7 (Perpendicular Point Cave/Rock Shelter), a large sea cave with four oven features, stone artefacts, and extensive midden material (burnt shell scatter) (NZAA 2024a). Additional sites in the wider Punakaiki area include caves/rock shelters (K30/3, K30/5, K30/6, K30/65), middens (K30/39), a burial at Irimahuwhero Bay (K30/40, c. 750 m NNE of the project footprint), and historic transport features such as the Inland Pack Track (K30/82, K30/87) (NZAA 2024b). Collectively, these sites demonstrate the intensive use of the coastline for occupation, resource gathering, and movement. They also highlight a general potential for unrecorded sites to be present within the general area.

Historic Accounts: The significance of Perpendicular Point is reflected in early European observations. In 1846, Charles Heaphy sketched the explorer Thomas Brunner ascending the cliff edge at Te Miko by flax rope ladder, underscoring both the difficulty of traversing the coastal cliffs and their importance

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as a historic route (Heaphy 1846; Stack 1893). Such narratives confirm the challenging but strategic role of Perpendicular Point within both Māori and later European travel and exploration.

Contemporary Cultural Values: Ngāti Waewae, as mana whenua, hold ongoing associations with Te Miko and the wider Punakaiki area. The place is recognised as containing cultural and archaeological values that contribute to the living heritage of Ngāi Tahu (DOC 2025). While Te Rūnanga o Ngāti Waewae did not submit on the current resource consent application, they have requested the inclusion of an Accidental Discovery Protocol (ADP) to ensure that any cultural or archaeological material uncovered during works is appropriately protected and managed (HNZPT 2025).

The Ngāi Tahu Atlas identifies several culturally significant locations within the broader project area (Te Rūnanga o Ngāi Tahu 2024, Figure 3). These include:

- **Te Miko** – the Māori name for Perpendicular Point, the southern point of Irimahuwhero (Irimahuwhero Bay) near Barrytown. The name derives from the miko, the shoot of the nīkau palm (*Rhopalostylis sapida*), abundant in the area.
- **Irimahuwhero** – the correct spelling of Iramahuwheri Bay, the small bay north of Te Miko.
- **Te Tai Poutini Coastal Trail** – a traditional coastal route.
- **Punungairo** – the Māori name for Bullock Creek, which flows westward from the Paparoa Range into the Pororari Lagoon.

These cultural associations reinforce the layered Māori and later historical significance of Te Miko within the Punakaiki landscape.

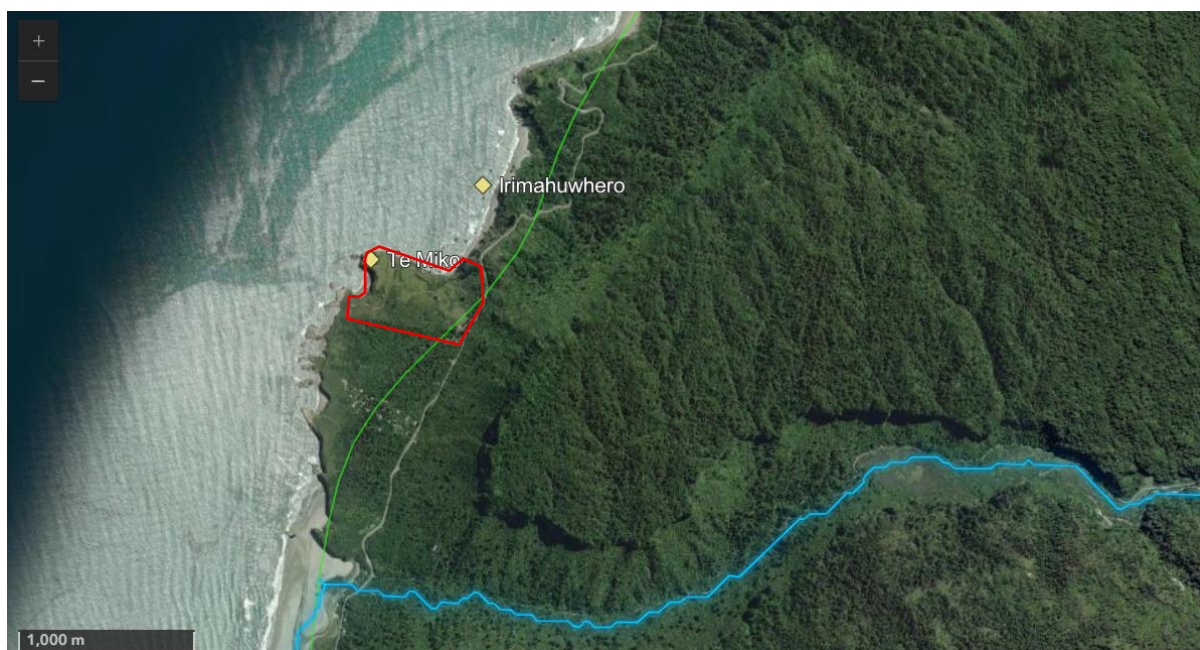


Figure 3. Excerpt from the Ngāi Tahu Atlas showing the approximate project footprint (red polygon) in relation to culturally significant sites. The green line denotes Te Tai Poutini Coastal Trail while the blue line denotes Punungairo/Bullock Creek.

5.2. Early European Settlement

Early European Occupation: European activity along the Punakaiki coast began in the mid-19th century with exploratory journeys by Thomas Brunner and Charles Heaphy. In May 1846 they traversed the coastline north of the Pororari River, assisted by Kehu and Tau, climbing flax rope

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ladders at Te Miko (Perpendicular Point). Heaphy's sketch of this event, held in the Alexander Turnbull Library, provides one of the earliest European depictions of the area (Heaphy 1846; NZHistory 2021).

The steep cliffs and rugged terrain made Punakaiki challenging for permanent European settlement, but the district was strategically significant as a corridor between Māwhera (Greymouth) and Kawatiri (Westport). With the discovery of gold in the Grey and Buller districts in the 1860s, traffic along both coastal and inland routes intensified. The Inland Pack Track, cut in 1867 to provide a safer alternative to the coastal ladders and cliffs, became a vital overland route. Surviving sections of this route are now recognised archaeological sites (K30/82, K30/87) (DOC 2025; NZAA ArchSite).

The earliest cadastral surveys incorporating the project area are the 1905 survey plans (SO 6209 and SO 6296, Figure 4-5). These plans show Perpendicular Point in detail, with the Brighton to Greymouth Road forming the eastern boundary. They illustrate the early formalisation of road infrastructure and land subdivision in the Punakaiki district.

Mining in the District: Mining schedules from the late 19th century list "Te Miko" in official returns, but this usage refers to the Te Miko Survey District rather than the specific headland (AJHR 1898–1899). No evidence exists of mining within the project footprint itself. The steep limestone cliffs and thin soils of Perpendicular Point were unsuitable for mining, which was concentrated instead on the Barrytown flats, Bullock Creek (Punungairo), and inland valleys (Te Ara 2015; DOC 2017). The 1905 survey plans confirm the absence of mining features within the block.

Tourism and the Truman Track: From the late 19th century, Punakaiki's dramatic scenery drew attention. The Pancake Rocks and Blowholes became a celebrated natural attraction, with published descriptions appearing in newspapers by the 1890s (An Encyclopaedia of NZ 1966; DOC n.d.). The Truman Track, immediately south of the project area, was developed in the 20th century to provide access to sea caves, blowholes, and coastal cliffs, and remains a key visitor walk (DOC n.d.; DOC 2021).

Perpendicular Point / Te Miko: Perpendicular Point retained its reputation as a hazard on the West Coast road until the late 1920s, when an inland alignment of State Highway 6 was formed. Contemporary newspapers described the dangers of narrow cliff-edge sections and the need for improvements (Grey River Argus 1928). A 1949 map labels both *Perpendicular Pt* and *Irimahuwheri*, showing the Coast Road as the defining eastern boundary (Figure 6). Within a decade, 1950s aerial photography provides the first photographic evidence of land use in the project footprint: scrub-covered terraces, cleared paddocks, and a homestead with associated fencelines. These images illustrate the transition from scrubland to pastoral use (Figure 7).

Twentieth-Century Farming and Use: Throughout the 20th century, Te Miko was managed as a small pastoral block. The 1950s aerial confirms the extent of paddock clearance, shelterbelts, and farm buildings, while the Coast Road continued to serve as the eastern boundary. Farming remained modest, with no large-scale infrastructure. By the later 20th century, Punakaiki increasingly became defined by conservation and tourism, with the establishment of Paparoa National Park and road improvements reinforcing the transition. The project site today reflects this layered history: a marginal coastal farm block within a wider environment valued for its scenic and cultural heritage (Te Ara 2015; Buller District Council n.d.).



Figure 4. 1905 survey plan (SO 6209) showing Perpendicular Point and the project footprint. The eastern boundary of the development area is defined by the Brighton to Greymouth Road. Source: GRIP 2025.

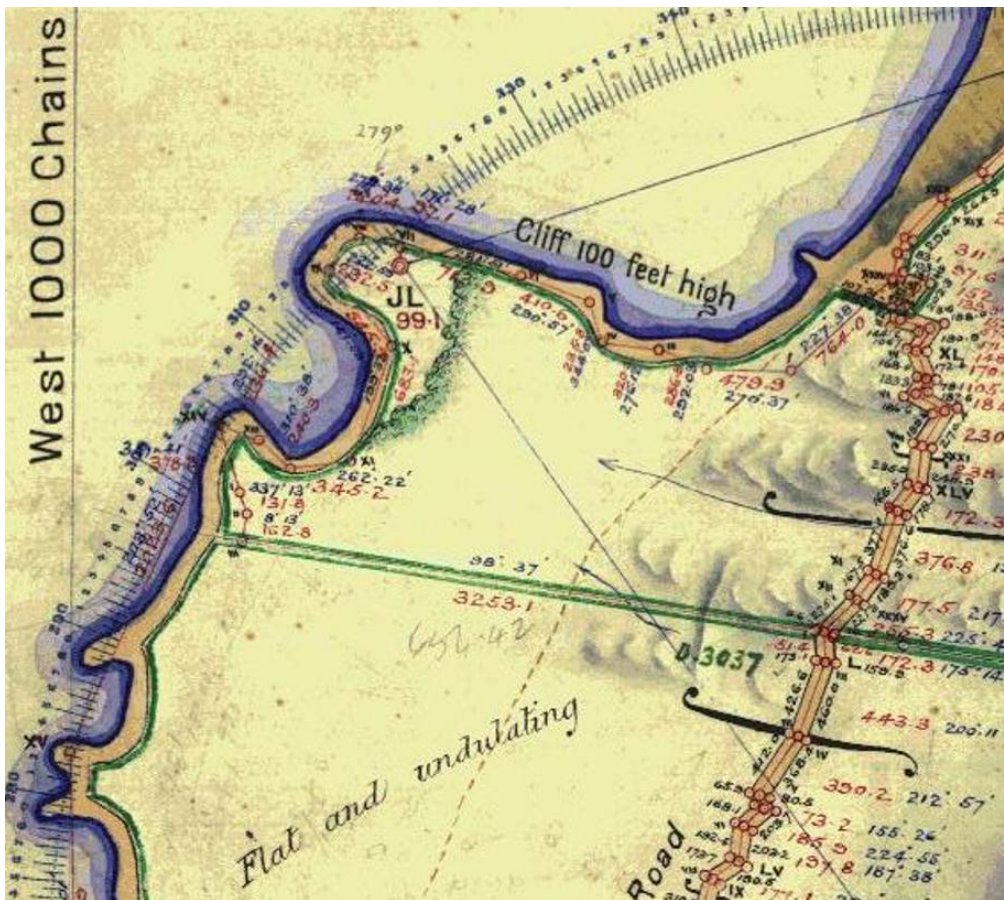


Figure 5. 1905 survey plan (SO 6296) showing Perpendicular Point and the project footprint. The eastern boundary of the development area is defined by the Coast Road. Source: GRIP 2025.

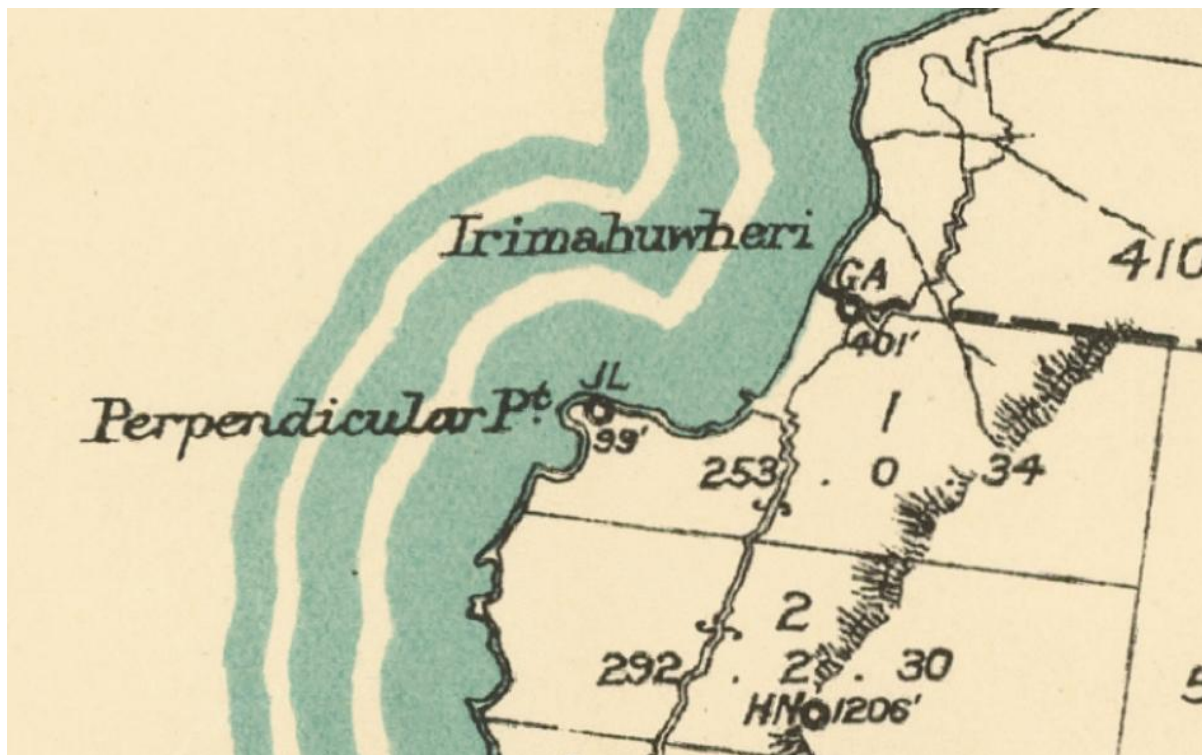


Figure 6. 1949 map showing Perpendicular Point and the project footprint. The eastern boundary of the development area is defined by the Coast Road. Source: GRIP 2025.



Figure 7. 1950s aerial imagery showing Perpendicular Point and the project footprint. The eastern boundary of the development area is defined by the Coast Road, with the homestead marked in a red circle. Source: Retrolens 2025.

6. Previous Archaeological Work

6.1. Recorded Archaeological Sites

The New Zealand Archaeological Association (NZAA) “ArchSite” digital database identifies all known or recorded archaeological sites within an area, providing information on grid reference, condition, and site descriptions. Records in the database have been compiled by different individuals and agencies over time, and consequently vary in accuracy and level of detail. While ArchSite generally locates sites as a single point, the archaeological footprint often extends more broadly than a single coordinate, particularly for older or complex sites.

Five recorded sites are located within the immediate vicinity of the Punakaiki Wild project area (Figure 8, Table 1):

- **K30/7 (Perpendicular Point Cave/Rock Shelter):** Large sea cave situated at the base of the cliff on the western side of Te Miko headland. Contains ovens, stone artefacts, and extensive midden scatter (burnt shell). This is the most significant site in proximity to the project footprint.
- **K30/5 and K30/6:** Rock shelters on the southern and western margins of Te Miko, associated with coastal occupation and use of sheltered cliff-base locations.
- **K30/3:** Rock shelter to the north of Irimahuwhero Bay, near Meybille Bay.
- **K30/40:** Burial recorded at Irimahuwhero Bay, c. 500–600 m north of the project footprint, noted as the grave of “Tin Man” (1892).

Together, these sites demonstrate that Perpendicular Point and the adjacent bays were focal areas for Māori use, combining occupation, resource gathering, and burial practices. In the wider Punakaiki area, additional recorded sites include middens (e.g. K30/39 in Punakaiki village), further caves and rock shelters, and historic route features such as segments of the Inland Pack Track (K30/82, K30/87). While not immediately adjacent to the project footprint, these attest to the intensive occupation of the coastline and the role of the district as both a resource base and a movement corridor.

Table 1. Recorded archaeological sites in the immediate vicinity of the project footprint at Perpendicular Point/Te Miko. Sites include caves, rock shelters, and a burial at Irimahuwhero Bay. Source: NZAA ArchSite 2025.

NZAA ID	Site Type	Grid Coordinates (NZTM)	Distance to project area	Details from Site Record Form
K30/7	Cave/rock shelter with ovens & midden	1463749E / 5340653N	At/adjacent	Large sea cave at the base of the cliff on the western side of Te Miko. Contains ovens, stone artefacts, and extensive midden scatter (burnt shell).
K30/5	Rock shelter	Not provided	<1 km	Rock shelter on the southern margin of Te Miko, associated with coastal occupation and use of cliff-base locations.
K30/6	Rock shelter	Not provided	<1 km	Rock shelter on the western margin of Te Miko, likely associated with seasonal occupation and resource use.

NZAA ID	Site Type	Grid Coordinates (NZTM)	Distance to project area	Details from Site Record Form
K30/3	Rock shelter	Not provided	~1.5 km	Rock shelter north of Irimahuwhero Bay, near Meybille Bay.
K30/40	Burial	1463649E / 5340153N	~600–700 m	Burial recorded at Irimahuwhero Bay, noted as the grave of 'Tin Man' (1892).

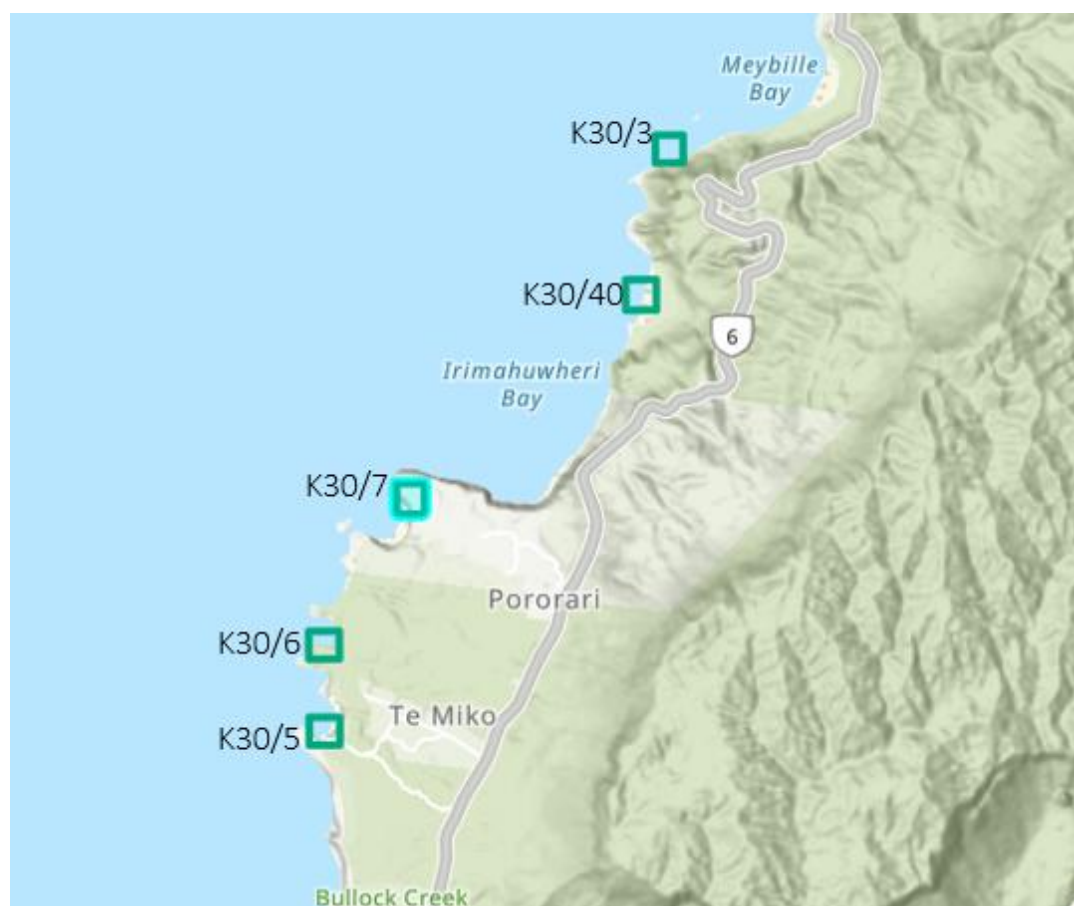


Figure 8. Map showing recorded archaeological sites in the immediate vicinity of the project footprint at Perpendicular Point/Te Miko. Sites include K30/3 (rock shelter), K30/5 and K30/6 (rock shelters), K30/7 (cave/rock shelter with ovens and midden), and K30/40 (burial at Irimahuwhero Bay). Source: NZAA ArchSite 2025.

6.2. New Zealand Heritage List / Rārangī Kōrero

No sites on the New Zealand Heritage List / Rārangī Kōrero are located within or immediately adjacent to the Punakaiki Wild project footprint at Perpendicular Point/Te Miko.

The closest entries on the List are associated with the wider Punakaiki area and Paparoa National Park. These include the Dolomite Point / Pancake Rocks Scenic Reserve, a place recognised for its internationally significant limestone and karst formations, and the Paparoa National Park Historic Area, which encompasses archaeological, cultural, and natural values along the coastal strip between Punakaiki and Barrytown. Both listings are situated south of the project site, in and around Punakaiki village.

These listed places are outside the project footprint and will not be affected by the proposed works.

6.3. Buller District Plan

There are no identified heritage items or scheduled archaeological sites in the Buller District Plan located within or directly adjacent to the Punakaiki Wild project footprint at Perpendicular Point/Te Miko. The District Plan does, however, recognise a range of heritage places and cultural landscapes in the wider Punakaiki area. These include the Paparoa Character Area, which identifies the coastal corridor between Barrytown and Punakaiki for its high scenic and heritage values, and mapped Sites and Areas of Significance to Māori (SASM), including SASM 30 – Te Miko (Ara Tāwhito), which incorporates the project area. These overlays acknowledge the cultural importance of Te Miko as part of the wider Ngāi Tahu customary landscape and recognise its role in traditional travel, occupation, and resource use. No District Plan heritage listings fall within the proposed development footprint. The proposed works will therefore not directly affect any scheduled heritage items, though the site lies within a broader cultural landscape identified for its heritage significance.

6.4. Engineering New Zealand: Heritage Register

There are no heritage sites, structures, or engineering works listed on Engineering New Zealand's Heritage Register within or in proximity to the project footprint at Perpendicular Point/Te Miko. The Register primarily identifies notable bridges, roads, and infrastructure of historical and technical significance. The Coast Road (State Highway 6) in the vicinity of the project is not listed.

6.5. Memorials and Monuments

There are no memorials, monuments, or commemorative structures recorded in Manatū Taonga – Ministry for Culture and Heritage's online New Zealand Memorials Register within or in proximity to the project footprint at Perpendicular Point/Te Miko. The nearest listed memorials are located in the wider Buller District, including at Punakaiki village and Westport, but none are within or immediately adjacent to the proposed development site.

6.6. Places of significance to Māori

As noted earlier, Kā Huru Manu (Ngāi Tahu 2024) identifies several culturally significant locations within the wider Punakaiki/Te Miko landscape (Figure 3). These place names highlight the enduring connections of Ngāti Waewae, as mana whenua, with the coastal and inland environment of Te Tai Poutini:

- **Te Miko** – The Māori name for Perpendicular Point. The name refers to *miko*, the shoot of the nīkau palm (*Rhopalostylis sapida*), which is common in the area. The cliffs at Te Miko formed part of an ara tāwhito (traditional travel route) and were associated with occupation, seasonal food gathering, and rope-ladder crossings.
- **Irimahuwhero (Irimahuwhero Bay)** – The small bay immediately north of Te Miko. Recorded as the location of a burial (K30/40), the bay was historically important for fishing and gathering shellfish.
- **Punungairo (Bullock Creek)** – A waterway flowing from the Paparoa Range into the Pororari Lagoon. The creek is noted in Ngāi Tahu oral tradition and was valued as a mahinga kai, particularly for tuna (eel).
- **Te Tai Poutini Coastal Trail** – The Punakaiki section of the coast was part of the traditional ara tāwhito network, linking settlements and resource areas along the West Coast and connecting inland passes such as Nōti Raureka (Browning Pass).

These named places reinforce the cultural significance of the project area as part of a wider landscape of occupation, mahinga kai, and travel routes. Te Miko in particular is recognised as both a place of difficulty and resourcefulness, where the coastal cliffs were negotiated using ladders, and caves were used as shelters and food-processing sites.

7. Site Visit

A site visit was undertaken on 1 September 2025 by TJ O’Connell of South Island Archaeology (SIA). The project footprint at Perpendicular Point (Te Miko), Punakaiki was traversed on foot, with emphasis on the proposed locations of built elements (lodge, cabins, worker accommodation, carparking, and service areas), terrace margins above the cliff, and visible landform features. The location of the recorded archaeological site K30/7 (Perpendicular Point Cave/Rock Shelter) at the base of the cliff was noted, but the cave itself was not visited due to lack of safe access.

Observations and photographs are described below (Figures 9-21). Several locations are best understood when read in conjunction with Figure 2 (Site Plan), which shows the property boundary, proposed lodge, cabins (single and family/group), worker accommodation, support and service buildings, parking areas, potable water storage, and associated infrastructure.

Northern Entrance and Existing Features: At the northern entrance off Coast Road, an existing corrugated iron shed stands adjacent to the forecourt (Figure 10). The surrounding area is grassed and modified for vehicle access. Approximately one-third of the way down the access road, a large boulder was recorded (Figure 11). While a natural feature, such boulders can sometimes hold cultural associations; however, no modification or evidence of cultural use was observed here.

Carparking area: The proposed public carparking area lies further downslope on open pasture adjacent to the road corridor (Figure 12). No surface archaeological features were identified.

Proposed Lodge Site: The lodge is proposed for the prominent headland terrace overlooking the Tasman Sea. From the access approach, the headland is visible to the north (Figure 13), with the terrace itself forming a flat platform above the cliff (Figure 14). No surface archaeological features (middens, oven stones, or artefacts) were observed within this area.

Family/Group Cabins (FC1–FC4): The coastal edge west of the main terrace is the proposed location for family/group cabins. The general setting of FC1–FC2 is shown in Figure 15, while the southwest corner of the project footprint, where FC4 will be sited, is shown in Figure 16. Both locations are pasture with no visible archaeological material.

Worker Accommodation: The proposed worker accommodation and services building will be located inland of the lodge site, toward the northern escarpment (Figure 17). This area consists of modified pasture. No archaeological features were identified.

Single Cabins (SC3–SC8): The single cabins are proposed across the central terrace, set back from the coastal margin. The general area is shown in Figure 18. The ground surface exhibits signs of stock and vehicle use, with ponded water visible after recent rain. No surface archaeological evidence was observed.

Landform Features: Several natural landforms within the footprint were inspected as they represent areas of potential archaeological sensitivity. They include natural gully and drainage lines, regenerating vegetation and wet ground (Figure 19). Such gullies can be locations for ovens, midden

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deposits, or small camps, although none were visible here. Two prominent boulders were also noted. The first lies on the northern side of the property adjacent to a fenceline (Figure 20). The second, larger boulder is situated close to the existing access road (Figure 13). Neither displayed evidence of cultural modification.

Cliff Edge and Coastal Margin: From the cliff-top edge, the steep limestone bluff and coastal platform at Perpendicular Point are clearly visible (Figure 21). The recorded site K30/7 (cave/rock shelter) is located at the base of these cliffs. Due to safety constraints, the cave was not entered, but its setting relative to the project footprint was confirmed. No other features were identified along the terrace margin.

Summary of Observations: The project footprint comprises a landscape of modified pasture and natural terraces above the coastal cliffs. No surface archaeological features were identified during the site visit.



Figure 9. View overlooking Perpendicular Point (Te Miko), Punakaiki, looking westward toward the Tasman Sea. The image shows the open terrace and coastal vegetation forming part of the project footprint.



Figure 10. View of the existing shed located near the site entrance at Perpendicular Point (Te Miko). The photograph looks northward, showing the gravelled forecourt and surrounding vegetation.



Figure 11. Large boulder located near the existing access road within the project footprint, approximately one-third of the way down from the entrance. The feature sits in open pasture with no associated infrastructure or visible cultural modification.



Figure 12. View of the proposed location of the public carparking area at Te Miko, looking east toward the Coast Road. The area comprises open pasture with no visible archaeological features.



Figure 13. View looking northward toward the headland at Te Miko where the proposed lodge will be located. The foreground shows ground requiring an access road leading up to the terrace edge. No visible archaeological features were observed.



Figure 14. View of the general location of the proposed lodge at Te Miko, looking north across the terrace toward the cliff edge. The area is currently open pasture with no visible archaeological features.



Figure 15. View of the coastal edge at Te Miko in the general area where family/group cabins FC1–FC2 are proposed. Looking westward toward the Tasman Sea. The area comprises open pasture with no visible archaeological features.



Figure 16. View of the ground surface in the southwest corner of the project footprint where proposed family/group cabin FC4 will be located. Looking south-westward toward the coastal margin. The area is pasture with no visible archaeological features.



Figure 17. View of the general area where the proposed worker accommodation will be located at Te Miko, looking northward toward the inland escarpment. The area is modified pasture with no visible archaeological features.



Figure 18. View looking westward toward the general area where proposed single cabins SC3–SC8 will be located at Te Miko. The foreground shows pasture with surface water pooling; no visible archaeological features were identified.



Figure 19. View of a natural gully and drainage line within the project footprint, showing regenerating vegetation and wet ground.



Figure 20. View of a large boulder on the northern side of the project footprint at Te Miko. The feature is adjacent to an existing fenceline overlooking the coastal margin. No cultural modification was observed on the boulder during inspection.



Figure 21. View from the project footprint toward the cliffs and coastal platform at Perpendicular Point (Te Miko). The base of these cliffs contains the recorded archaeological site K30/7 (cave/rock shelter), though the cave itself was not accessed due to hazardous conditions.

8. Results

The archaeological assessment, drawing on historic survey plans, aerial imagery, ArchSite records, and the 1 September 2025 site visit, confirms that the project footprint occupies an exposed coastal terrace above the cliffs of Perpendicular Point (Te Miko). The terrace comprises pasture with regenerating scrub, poor surface drainage, and several natural gullies.

No visible archaeological features—middens, oven stones, artefacts, or structural remains—were identified across proposed lodge, cabin, worker accommodation, carparking, or access road locations. Prominent boulders and drainage lines were inspected but showed no cultural modification.

A corrugated-iron shed near the site entrance is clearly modern and of no archaeological significance. The current house within the wider property lies outside the area of proposed works and will not be affected. No evidence was identified during this assessment to suggest the presence of an earlier 19th-century homestead within the project footprint.

The terrace retains areas of ponded water and natural gullies, which can be archaeologically sensitive. However, the current development layout largely avoids these features, limiting potential impacts. The terrace's exposure, thin soils, and poor drainage would also have reduced its suitability for sustained pre-European settlement compared with the more sheltered coastal flats nearby.

The nearest site, K30/7, a cave/rock shelter with ovens and midden, lies at the cliff base below the footprint. Other nearby sites include rock shelters (K30/3, K30/5, K30/6) and a burial at Irimahuwhero Bay (K30/40). None occur within the development terrace itself, though their presence demonstrates Māori use of the wider landscape.

The redevelopment involves building platforms, roading, and services, but these occupy only part of the 20 ha property. Much of the land will remain undeveloped, reducing the overall potential archaeological exposure.

The project footprint shows no surface archaeology and holds low to moderate potential for subsurface deposits, primarily in terrace margins and drainage features. With most works sited away from gullies, and given the exposed and poorly drained character of the terrace, overall archaeological risk is considered low to moderate in scale.

9. Archaeological and Other Values

9.1. Archaeological Values

Archaeological values relate to the potential of a place to provide evidence and information on the history of New Zealand. This is framed within the existing body of archaeological knowledge and current research. Statements on archaeological values of the project area are made below regarding the Heritage New Zealand Pouhere Taonga guidelines for writing archaeological assessments. The following criteria are accounted for to assess archaeological values from within the project footprint:

1. **Condition** – is the site in good condition?
2. **Rarity or uniqueness** – is the site notable in any other way in comparison to other sites of its kind?

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3. **Contextual value** – context or group value arises when the site is part of a group of sites, which taken together as a whole, contributes to the wider values of the group or archaeological, historic or cultural landscape. There are potentially two aspects to the assessment of contextual values; first, the relationship between features within a site, and second, the wider context of the surroundings or setting of the site.
4. **Information potential** – what current research questions or areas of interest could be addressed with information from the site?
5. **Amenity value** (e.g., educational, visual, landscape) – does the site(s) have potential for public interpretation, access and education?
6. **Cultural associations** – does the site(s) have any special cultural associations for any particular communities or groups, e.g., Tangata Whenua, European, or Chinese.

Archaeological risk for the project footprint is considered low to moderate in scale. While no surface features were identified within the project footprint, the proximity of recorded sites (K30/7 and others along the Te Miko/Irimahuwhero coastline) demonstrates wider cultural use of the area. If unrecorded sites are present within the footprint, they are most likely to occur near gullies, drainage lines, or terrace margins. Likely site types would include small ovens, midden scatters, artefact findspots, or temporary camp features consistent with seasonal coastal occupation.

Table 2. Potential archaeological values associated with potential Māori archaeological remains.

Value	Assessment
Condition	No archaeological features were identified on the terrace during the site visit. The land is modified pasture with poor drainage, localised ponding, and some natural gullies. If sites are present, they are likely to be subsurface and in variable condition due to past farming activity.
Rarity or uniqueness	The footprint does not contain any known sites of unique form or type. If present, features such as ovens, midden scatters, or small camps would represent site types common to the West Coast coastal landscape, though still significant as part of the wider pattern of Māori use.
Contextual value	The terrace is immediately above K30/7 (cave/rock shelter with ovens and midden) and within 1 km of further recorded shelters and a burial at Irimahuwhero Bay. This proximity situates the footprint within a broader archaeological landscape of high cultural value, even if no sites lie directly within it.
Information potential	Any subsurface deposits, particularly near hydrology features, could provide information on seasonal use of exposed coastal terraces and their role in wider settlement patterns. Such evidence would add to understanding of resource use and mobility along Te Tai Poutini.
Amenity value	No visible features are present to contribute to public interpretation or amenity. The value lies in the potential contribution of archaeological material, if encountered, to research and understanding rather than to visual appreciation.
Cultural associations	The project area lies within the Ngāti Waewae rohe and is encompassed by SASM 30 (Te Miko – Ara Tāwhito) in the Proposed Te Tai o Poutini Plan. Recorded sites at Te Miko and Irimahuwhero confirm longstanding cultural association, reinforcing the cultural sensitivity of the wider area.

9.2. Tangata Whenua & Other Values

This archaeological assessment addresses only the physical archaeological record and associated historical context. It does not seek to assess the broader cultural values of the project footprint or the surrounding landscape.

The Punakaiki coastline, including Te Miko (Perpendicular Point) and Irimahuwhero Bay, is recognised as a traditional Ngāi Tahu landscape. Recorded archaeological sites, including caves, rock shelters, ovens, middens, and a burial, reflect customary use of the coast for travel, occupation, and mahinga kai. The area is encompassed by SASM 30 (Te Miko – Ara Tāwhito) in the Proposed Te Tai o Poutini Plan, confirming its recognition in statutory planning frameworks as a place of cultural significance.

However, the identification and interpretation of cultural values associated with these places lies solely with the relevant tangata whenua, in this case Te Rūnanga o Ngāti Waewae. Their mātauranga and perspective are essential to understanding the full significance of the project area. Consultation with tangata whenua should therefore be undertaken in parallel with archaeological processes to ensure that cultural values are properly recognised and addressed.

10. Assessment of Effects

10.1. Description of Proposed Works

Please refer to Section 1.2 of this report for the description of proposed works.

10.2. Potential Effects

The archaeological assessment confirms that the project footprint lies within a wider cultural and archaeological landscape of significance, with recorded sites present along the Te Miko/Irimahuwhero coastline. No surface archaeological features were identified within the terrace footprint, but the potential for unrecorded subsurface deposits—particularly ovens, midden scatters, or artefact findspots—remains possible, especially near terrace margins and hydrological features.

Ground disturbance associated with building platforms, roading, and infrastructure has the potential to directly affect any archaeological deposits if present. While much of the development footprint avoids natural gullies and drainage lines, localised excavation for foundations and services may still intersect sensitive areas. Given the scale of works relative to the overall 20 ha property, potential effects are considered low to moderate in scale, but the consequences of uncovering subsurface archaeology would require immediate management.

10.3. Mitigation of Effects

All pre-1900 archaeological sites are protected under the provisions of the Heritage New Zealand Pouhere Taonga Act 2014. It is unlawful to destroy or modify such sites without an authority from Heritage New Zealand Pouhere Taonga (HNZPT).

Two pathways are available for managing potential effects:

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- Accidental Discovery Protocol (ADP): Works could proceed under a robust ADP, provided this is agreed with HNZPT and tangata whenua (Te Rūnanga o Ngāti Waewae). This would require immediate notification and stand-down if archaeological material is uncovered, allowing time for assessment and, if necessary, an authority application.
- Archaeological Authority: Alternatively, an authority could be sought in advance, providing formal approval for modification of any sites if encountered and reducing the risk of unexpected delays.

Te Rūnanga o Ngāti Waewae, through Poutini Environmental, has provided its *Accidental Discovery Protocol (2023)* for adoption as part of the project. This protocol was provided before completion of this Archaeological Assessment. This protocol aligns with the management principles outlined above and provides a culturally appropriate process to guide responses in the event of an accidental discovery. A copy of the Ngāti Waewae ADP is appended to this assessment (Appendix 1).

Given the low to moderate risk profile of the footprint, management under an ADP may be appropriate if iwi support is secured. However, consultation with HNZPT, Ngāti Waewae, and other relevant parties is strongly recommended to confirm whether this approach aligns with their expectations.

It should also be recognised that if subsurface archaeology is exposed during works, particularly in sensitive locations (e.g. terrace margins or near gullies), stand-downs may be required while authority processes are followed. This risk should be factored into project planning and construction programming.

11. Conclusions & Recommendations

All pre-1900 archaeological sites are protected under the provisions of the Heritage New Zealand Pouhere Taonga Act 2014, whether they are recorded or not. It is unlawful to destroy, damage, or modify archaeological sites without an authority from Heritage New Zealand Pouhere Taonga (HNZPT).

This assessment confirms that:

- No surface archaeological features were observed within the project footprint.
- The site is exposed, poorly drained, and modified by pastoral use, but lies in close proximity to recorded sites (K30/7, K30/3, K30/5, K30/6, and K30/40) that demonstrate Māori occupation and use of the wider landscape.
- Archaeological risk is considered low to moderate in scale, with potential for subsurface deposits primarily near terrace margins and hydrological features.
- Proposed works occupy only part of the c. 20 ha property, reducing the overall extent of potential ground disturbance.

Two management pathways are available:

- Accidental Discovery Protocol (ADP): Works could proceed under a robust ADP if supported by iwi and confirmed as appropriate by HNZPT.
- Archaeological Authority: Alternatively, an authority could be sought in advance, reducing the risk of stand-downs if archaeology is discovered during works.

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Te Rūnanga o Ngāti Waewae, through Poutini Environmental, has already provided its *Accidental Discovery Protocol (2023)* for adoption as part of the project. This protocol provides a culturally appropriate framework for managing any discoveries should works proceed under the ADP pathway.

The following recommendations are made:

- Consultation: Te Rūnanga o Ngāti Waewae should be consulted regarding this assessment and the preferred management pathway (ADP vs Authority). Outcomes may require updates to the report. HNZPT should also be engaged early to confirm expectations.
- Project details: This assessment is based on the current development footprint and plans. Any future changes to the extent or depth of works must be reviewed to determine whether additional archaeological input is required.
- Risk management: If works proceed under an ADP, the project team must understand the risks of stand-downs and potential delays should archaeology be uncovered. These risks should be factored into construction programming.
- Archaeological Site Instruction (ASI): If an Authority is sought, an ASI document should be prepared. This would outline monitoring requirements, on-call procedures, and operational guidelines for managing archaeological discoveries.

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Appendix 1. Ngāti Waewae Accidental Discovery Protocol (2023)