APPENDIX ONE

TECHNICAL REVIEWS FOR COUNCIL

PUNAKAIKI WILD LODGE APPLICATION, TE MIKO LANDSCAPE & NATURAL CHARACTER EFFECTS REVIEW

Prepared For:

Hollis Planning & Buller District Council

Brown NZ Ltd
March 2025

1. Introduction

This review addresses the landscape and natural character effects associated with the proposed *Punakaiki Wild Lodge* at Te Miko, north of Punakaiki. The proposal has been subject to a detailed assessment of landscape effects undertaken by Nikki Smetham of Rough Milne Mitchell Landscape Architects (RMM) and focuses very largely on that report (*Attachment Q* to the Application), dated the 20th of December 2024 and the *Revised Landscape and Visual Graphic Attachment* (*Attachment R*).

In addition, it takes into account the following reports, which have also been read in the course of this review:

Attachment E – Ecology Report
Attachment L – Architectural Plans: Lodge
Attachment L – Architectural Plans: Lodge Support Building
Attachment L – Architectural Plans: Worker Accommodation Building
Attachment O – Site Earthworks and Details
Attachment K – Site Master Plan
Attachment P – Vegetation Managment Plan
Attachments S – Detailed Ecological Report

In Section 1.2 of the RMM / Smetham Report it is stated that the landscape assessment has been undertaken in accordance with the guidelines of *Te Tangi a te Manu*, the NZILA guidelines in relation to landscape assessment (May 2022). Consequently, **Section 2** of this review addresses this statement, comprising a technical review that focuses on the assessment methodology employed by Ms Smetham, the matters covered by the assessment, and its structure.

Section 3 of this review then addresses the findings of the report in relation to landscape and natural character effects, indicating areas where there is agreement in relation to Ms Smetham's findings and any areas of concern or disagreement. This is followed by **Section 4**, which focuses on the effects identified relative to the Operative Buller District Plan and *Te Tai o Poutini* – the proposed combined district plan for the West Coast – together with the conclusions of this review and any recommendations.

2. Technical Review

At Section 1.1, the RMM Report's format is outlined as follows:

- *A description of the proposal*
- *A description of the site.*
- *An outline of the relevant policy provisions within the Operative Buller District Plan (oBDP) and the proposed Te Tai o Poutini Plan (TTPP)*
- *The identification and description of the receiving environment. The receiving environment is described in terms of the landform, land cover and land use attributes and how those landscape attributes contribute to the receiving environment's existing landscape values.*
- *An assessment of the actual and potential landscape, natural character and visual effects, including cumulative effects.*
- *An assessment against the relevant statutory provisions.*
- *A conclusion.*

In my view this is consistent with the approach to landscape assessment anticpated in *Te Tangi a te Manu,* as too are the rating scales outlined in Section 1.2. I further note that even though the title of the report

and its Section 1 Introduction focus on the evaluation of landscape effects associated with the proposed lodge, Section 3.2 also address matters related to the coastal environment, including Section 4.7 of the Operative District Plan (The Coastal Environment) and the following – related – matters:

> *4.7.9.1. Siting and development of activities in a manner and scale which is in harmony with and/or enhances the character of the coastal environment.*
>
> *4.7.9.2. Improved quality of the coastal environment.*
>
> *4.7.9.3. Improved access to, and public appreciation of, the coastal environment.*

In addition, both the ODP and *Te Tai o Poutini* also address historic heritage and ecosystem (and indigenous biodiversity), which are relevant to both the landscape and natural character values of the Te Miko area. Importantly, the subject site is then identified as being located:

- Within an Outstanding Natural Landscape (ONL);
- Partly within an Area of High Natural Character (HNC Area) in the coastal environment;
- Partly within an Area of Outstanding Natural Character (ONC Area) in that same environment;
- In a Pounamu Management Area; and
- Within part of an Area of Significance to Maori.

Provisions within *Te Tai o Poutini* that are relevant to the area's identified values are also described in the RMM / Smetham Report, while Appendix A contains a more fulsome breakdown of all the ODP provisions that are relevant to the application.

This is followed by descriptions of the site and its wider landscape context, which usefully delve into the attributes of both in more detail. It also identifies the receiving environments found around the subject site (including its 14 existing dwellings on the coastal side of SH6), together with Te Miko's relationship with both the wider coastline and the renowned Punakaiki Rocks to the south. Of note, this description and analysis is supported by the Graphic Attachment images of Attachment R, particularly those of the site (pp.24 and 25) and from 5 key viewpoints (pp.27-29). Key physical, perceptual and associative values are also described, reflecting *Te Tangi a te Manu's* description of landscapes as the combination of these three 'layers' or dimensions.

Section 4.5 then employs 5 viewpoints that represent the receiving environments around the subject site to assess the effects of the proposed lodge on those 'catchments' and related audiences in some detail. Although this analysis does not employ explicit assessment criteria, the descriptive evaluation of effects for each viewpoint usefully details factors that would affect perception of the lodge and associated development (such as viewing distance and screening / integrating elements), any mitigating factors, and the nature of any incursion into the local landscape / environment and effects on it.

Again, this is supported by pp.27-29 of Attachment R, although the photos provided for Viewpoints 1, 2 and 5 are of poor quality, with that for Viewpoint 2 noticeably smaller than those provided for the other four viewpoints, while the image for Viewpoint 5 is made almost illegible due to the time of day at which it was taken (sun glare and lens flare). In my opinion, these three photos are not of the standard I would expect for a landscape assessment. I also note that no photo simulations or other graphic devices are employed to illustrate the location, form and scale of the proposed buildings – or even the location(s) of proposed planting. While 4 of the 5 viewpoints employed by RMM are too distant for montages or simulations to be meaningful, a photo simulation or even just an image from **Viewpoint 4** (the Irimahuwhero Lookout on SH6) pointing out the location of the lodge's proposed buildings and car parking would have been helpful in this regard.

Regardless, each viewpoint analysis culminates in a summary evaluation of the proposed lodge's landscape effects. I am unclear if this focus on 'landscape' effects alone is deliberate, but it appears to be contrary to

the ODP and *Te Tai o Poutini*, which address landscape and natural character as distinct entities. Instead, both appear to be treated 'as one' in this part of the RMM / Smetham Report. On this subject, it is only fair to acknowledge that *Te Tangi a te Manu* recognises the inherent overlap between landscape and natural character in many respects. Even so, there remain differences between them – in line with sections 6(a) and (b) of the RMA, and Policies 13 and 15 of the NZ Coastal Policy Statement (2010) and the related requirement to preserve outstanding natural character values versus the imperative to protect outstanding natural features and landscapes (to paraphrase the Act).

Notwithstanding this, Section 5 of the RMM Report then addresses both landscape and natural character values in its assessment of the proposal against relevant ODP policies. Consequently, the gap just referred to is largely 'patched over' in this part of the assessment. Furthermore, other related matters, including impacts on the site's cultural values and significance, and its ecological / habitat values, are also touched on in the statutory review. Somewhat confusingly, though, Section 5 begins by reviewing the proposal employing the ODP's Assessment Criteria for a Discretionary Activity; not a Non Complying Activity, which the lodge proposal is also described as being. As such, it should be subject to s.104(D) of the RMA, which provides two gateways through which the *Punakaiki Wild* proposal can pass to obtain consent – if:

> *(a) the adverse effects of the activity on the environment (other than any effect to which section 104(3)(a)(ii) applies) will be minor; or*
>
> *(b) the application is for an activity that will not be contrary to the objectives and policies of—*
>
> *(i) the relevant plan, if there is a plan but no proposed plan in respect of the activity; or*
>
> *(ii) the relevant proposed plan, if there is a proposed plan but no relevant plan in respect of the activity; or*
>
> *(iii) both the relevant plan and the relevant proposed plan, if there is both a plan and a proposed plan in respect of the activity.*

Having made this point, the RMM / Smetham Report does, in fact, 'test' the lodge proposal against the relevant provisions of the ODP and *Te Tei o Poutini*, concluding that the proposal is not contrary to them. These include provisions under the umbrella of ODP Section 4.6 addressing cultural values, Section 4.7 focusing on the coastal environment, Section 4.8 addressing ecosystems and natural habitats, and Section 4.9 which pertains to landscapes and natural features. Provisions particular to the Paparoa Character Area are also covered in this part of the RMM Report, as too are effects on natural character in a more limited fashion – primarily in relation to ODP Policy 9.2.3.3.

Turning to *Te Tei o Poutini*, the report then goes on to respond to NFL-01, NFL—P4, and NFL-P5, which address effects in relation to natural features and landscapes. That response includes commentary about effects on ONLs, local cultural values, and light (night-time effects). However, it again fails to directly address effects in relation to natural character values, even though natural character is mentioned in the introduction to Section 5.3. Again, this appears to be a gap in the RMM / Smetham Report.

Returning briefly to s.104(D)(a) and the magnitude of the proposed lodge's effects, the commentary under ODP Policy 9.2.2 includes the following statement:

> *The visual assessment demonstrates that the prominence of the Lodge will be visually absorbed into the site with **No - Low** effects on high natural coastal character.*

However, in terms of NZCPS Policy 13(1), it is also important to know if the proposed lodge would have an adverse effect on the ONC part of the site and/or a significant adverse effect on the natural character values of the 'other parts' of the local coastline, including its HNC area[1].

---

[1] ***Policy 13 Preservation of Natural Character***

> *(1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:*

In relation to landscape effects, there is description of the various means by which the lodge and ancillary proposals would be integrated into the Te Miko / Paparoa landscape, but I have been unable to find a summary assessment of the proposal against relevant provisions which concludes its effects would be 'minor'. For this, one must turn back to the very last sentence of Section 4.6, where it is stated that:

> *Overall, for the reasons set out above, the proposal will have a very low degree of adverse effects on the landscape values of the site and its receiving environment.*

At Section 6, the report reiterates this finding, as follows:

> *Overall, it is considered that the proposed development will have a No-Low degree of adverse effects on the landscape values of the site and the receiving coastal environment equating to a less than minor adverse effect. In addition, as a non-complying activity the proposed development will not be contrary to the relevant objectives and policies of the oBDP and the proposed TTPP..*

Consequently, both limbs of section 104(D) are ultimately addressed, albeit in a slightly circuitous manner.

3. Landscape & Natural Character Effects

3.1 Preliminary Comments

Having also reviewed Ground Up Studio's architectural plans, I agree that there would be a synergy between the site's gently rolling / undulating, terrace landforms and the profile of the proposed lodge. Furthermore, its colouring would help to bed the lodge into the subject site, even though it would be located quite close to the distal end of Perpendicular Point. The 9 single cabins to be sited close to the site's northern cliff-line (SC1-SC9) would share the same materiality and colour palette and would have a low 3.8m profile, although their rectilinear, pre-fab, form would be less responsive to the site overall. Conversely, the more centrally located car park, lodge support building, workers' accommodation building, and 6 other family cabins (FC1 – FC6) would also share the same colour scheme and materiality, but would also be slightly more visually and physically discreet – close to the western ocean cliffs, but further removed from SH6 and most other public vantage points.

Consequently, the location of the lodge building and 9 single cabins makes it unfortunate that a photomontage or simulation has not been provided for Viewpoint 4, which looks directly towards Perpendicular Point's northern coastline and terrace.

I have also reviewed RMA Ecology's assessment of ecological effects. In Section 2.1 of that report, the site is described as follows:

> *The site is located within the Punakaiki Ecological District and is a 'Paparoa Character Area'. The original vegetation of the Ecological District comprised of hardwood forest with few podocarps inland from the coast. The coastline had a vegetation community that comprised of high diversity broadleaved forest species and northern rata. The Punakaiki Ecological District has remained largely unmodified throughout, with the coastline of the district succumbing to the highest degree of modification.*
>
> *The Threatened Environments Classification (Walker et al. 2015) shows how much native (indigenous) vegetation remains within land environments, and how past vegetation loss and legal protection are distributed across New Zealand's landscape. The site lies within the Threatened Environment class categorised as having 30 % of indigenous cover left and 20 % of that cover legally protected from clearance. In these environments, the indigenous vegetation cover is still vulnerable to threats such as weeds, pests, logging, and other extractive land uses.*

> (a) *avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and*
>
> (b) *avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; ……*

This highlights the vulnerability of the site from an ecological standpoint, while in Section 3 of the report, it is concluded that:

> *The proposed plans for the development of the site are confined to very small areas of development and the placement of these on the concept design plans indicates that adverse effects on ecology values could be avoided in most instances ……*
>
> *Once we have undertaken site investigation to ground-truth aspects of ecology highlighted in this preliminary desktop report, we will be able to advise in more detail on the ways in which specific potential effects can be managed …….*
>
> *There are opportunities for enhancing the ecology of the site, and these could be included as part of the overall development project:*
>
> - *Control of invasive ecological weeds*
> - *Accelerate the change from native weedland/ grassland to native coastal and shrubland communities through a planting programme*
> - *Include pest animal control as part of the site restoration programme*
> - *Plant native species that produce flower and nectar to encourage native birds to the site.*

At least some of these proposals are incorporated in RMM's Vegetation Management Plan and Strategy (Attachment P), with extensive revegetation proposed across the centre of the site, as well as down both its northern and western coastlines. The coastal forest, shrubland, riparian, and wetland planting employed in this programme would mainly comprise native species, although I am uncertain if this is also the case in relation to the proposed Amenity Planting near the lodge, single cabins, workers accommodation, lodge support building and car park, as the Ecological Plant List found in Attachment R doesn't outline the planting proposed for those areas.

Notwithstanding this concern, it appears inevitable that the proposed planting would enhance the natural qualities of the site and wider Perpendicular Point coastline, although it would take time for this to offset the adverse effects associated with a more modified and developed coastal environment and landscape. As such, it is my view that a time frame of 10 years is more likely than the 5 years suggested by Ms Smetham for such enhancement to take hold and begin to effectively integrate the proposed buildings into their setting.

3.2 Additional Contextual Matters

As indicated above, I accept that Ms Smetham's report appropriately describes and analyses both the subject site and its wider landscape /coastal environment setting. This includes those public receiving environments exposed to the site and their related audiences – mostly road users on SH6.

I further agree that the ODP and *Te Tai o Poutini* provisions identified in her report capture those provisions more directly applicable to the subject site and lodge proposal. However, the absence of *Te Tai o Poutini* provisions addressing the natural character of the coastal environment is significant. Relevant policies include the following:

> ***CE-P2*** *Preserve the natural character, natural features and landscape qualities and values of areas within the coastal environment that have:*
>
> *a. Significant indigenous biodiversity including Significant Natural Areas as described in Schedule Four*
>
> *b. Outstanding natural landscapes as described in Schedule Five;*
>
> *c. Outstanding natural features as described in Schedule Six;*
>
> *d. High coastal natural character as described in Schedule Seven; and*
>
> *e. Outstanding coastal natural character as described in Schedule Eight*
>
> ***CE-P3*** *Only allow new subdivision, use and development within areas of outstanding and high coastal natural character, outstanding coastal natural landscapes and outstanding coastal natural features where:*

a. *The elements, patterns, processes and qualities that contribute to the outstanding or high natural character or landscape are maintained;*

b. *Significant adverse effects on natural character, natural landscapes and natural features, and adverse effects on areas of significant indigenous biodiversity, areas of outstanding natural character and outstanding natural landscapes and features are avoided;*

c. *The development is of a size, scale and nature that is appropriate to the environment;*

CE-P5 *Provide for buildings and structures within the coastal environment outside of areas of outstanding coastal natural character, outstanding natural landscape and outstanding natural features where these:*

a. *Are existing lawfully established structures; or*

b. *Are of a size, scale and nature that is appropriate to the area; or*

c. *Are in the parts of the coastal environment that have been historically modified by built development and primary production activities; or*

d. *Have a functional or operational need to locate within the coastal environment.*

In relation to these policies, it is further noted that most of the lodge site sits within HNC Area NCA43 shown on p.7 of RMM's Attachment Q, with the more forested, southern, parts of the site and rising land close to SH6 captured by ONC Area NCA42. All of the proposed lodge buildings and car park would avoid the ONC Area, although the lodge's accessway would still traverse it and an existing house and shed would also remain within it near SH6. For the sake of completeness, the Schedule 7 and Schedule 8 descriptions of these natural character areas is shown below, followed by Schedule 5's description of ONL45, which covers the entire site:

ONC Area NCA42 Dolomite Point Pancake Rocks

Sequence of distinct rock formations including Dolomite Point Pancake Rock and Razorback Point as well as adjoining cliff faces.

- *Varied amalgam of raw and exposed landforms, rock stratification, blowholes, sheer cliffs, caves, and windswept vegetation impart a strong sense of naturalness.*
- *Striking interface with the Tasman Sea. Sheer cliffs plunge dramatically into the sea.*
- *Dramatic wave action, evident coastal erosion, and seasonal changes to atmospheric conditions are highly expressive and natural processes.*
- *Extensive flax vegetation cover across the rock formations along with pockets of lowland forest and stands of nikau.*

HNC Area NCA43 Perpendicular Point – Woodpecker Bay

An extensive assemblage of craggy headlands and points, rock shoals and outcrops interspersed with sweeping sandy / stony beaches, dunefields, vegetated in coastal scrub and forest.

- *High aesthetic values are associated with the inter- relationship between the series of craggy points and outcrops and the open waters of the Tasman Sea.*
- *Natural qualities are clearly evident in the amalgam of landforms, wind swept vegetation cover and their relationship with the Tasman Sea contributing to a very endemic landscape.*
- *Dramatic wave action, evident coastal erosion, and seasonal changes to atmospheric conditions are highly expressive and natural processes.*
- *The prominence of number of houses / batches and SH6 along the coastline affects the perceived intactness and cohesion of the coastal environment, however they do not overly detract from the highly expressive and natural processes that dominate the landscape.*
- *Backed by a steep escarpment covered in mature coastal forest.*

ONL45 Ōkoriko/Razorback, Dolomite, and Perpendicular Point

Sequence of distinct rock formations including Dolomite Point Pancake Rock and Ōkoriko/Razorback Point as well as adjoining cliff faces.

- *Varied amalgam of raw and exposed landforms, rock stratification, blowholes, sheer cliffs, caves, and windswept vegetation impart a strong sense of naturalness.*
- *Striking interface with the Tasman Sea. Sheer cliffs plunge dramatically into the sea.*
- *Patterning of wind swept coastal forest and scrub across the rock formations along with pockets of lowland forest and stands of nikau reinforce the landscapes topography and exposure.*
- *Dramatic wave action, evident coastal erosion, and seasonal changes to atmospheric conditions are highly expressive and natural processes.*
- *This landscape as a whole is a landmark.*
- *Area below mean high water springs also scheduled in Proposed Regional Coastal Plan as ONL45.*

3.3 Re-assessment of the Proposal's Landscape & Natural Character Effects

I have utilised RMM's 5 viewpoints to re-evaluate the landscape and natural character effects of the proposed lodge, notwithstanding the limitations associated with Viewpoint 4's current imagery. In assessing both I have taken into account the descriptions of each 'unit', as described above. The following is also a brief summary of the key differences between landscape and natural character, which is applicable to the assessment process:

Landscape is an all-encompassing term. The New Zealand Institute of Landscape Architects (**NZILA**) Charter (2010) describes "*Landscape*" as being "*the cumulative expression of natural and cultural elements, pattern and processes in a geographical area."* The NZILA's *Te Tangi A Te Manu*[2] *– Aotearoa New Zealand Landscape Assessment Guidelines, 2022* (p. 35, section 4.22) – identifies landscape values as comprising three 'layers' of attributes:

> *The current professional practice of conceptualising 'landscape' as the overlap of its physical, associative, and perceptual dimension is reflected in 'case law' including the following recent decision*[3]*:*
>
> > *"Landscape means the natural and physical attributes of land together with air and water which change over time and which is made known by people's evolving perceptions and associations."*
>
> *"In keeping with the Act such a definition enables the development of landscape assessment which takes account of:*
>
> 1. *natural and physical environment: and*
> 2. *perceptual; and*
> 3. *associative aspects (beliefs, uses, values and relationships) which may change over time"*

As such, landscape effects relate to modification of both the biophysical and sensory (or perceptual) characteristics and values of an environment. Often, these are addressed in terms of changes to the biophysical values within a landscape, together with its visual legibility and memorability, expressiveness, aesthetic value, and its sense of place or identity and other 'associative' matters. Changes to the character and values of a landscape may also affect people's appreciation of its cultural and historical dimensions.

Natural character values and effects overlap with landscape effects, but have more of an emphasis upon effects that impair, or otherwise alter, the coastal environment's biophysical attributes and characteristics, together with its perceived character. Policy 13(2) of the NZCPS provides further direction in this regard, by identifying some of the elements / features / characteristics associated with natural character values.

Thus, coastal environments that are highly natural will be much more sensitive and susceptible to the effects of change than those that are already highly developed and modified. Yet, whereas landscape

---

[2] *P.35 Te Tangi A Te Manu – Aotearoa New Zealand Landscape Assessment Guidelines* (2022)

[3] Paras: 300-301 *[2011] NZEnvC 384, Mainpower NZ Limited v Hurunui District Council, ('Mount Cass Wind Farm'),*

values can often be 'driven' by one or two key factors (e.g. the dramatic profile of Punakaiki's pancake rock formations), natural character values tend to 'step' in line with the combined natural qualities of any environment – covering its water bodies, geomorphology and landforms, vegetation cover, land uses / activities and wider 'context'. Locations of high natural character value will generally reflect high levels of naturalness across all of these layers. Consequently, natural character effects are derived from changes to the characteristics of a coastal environment, either in part or whole, that affect its elements, features, patterns, and processes. These effects become adverse when such changes diminish that coastal environment's biophysical and/or perceived degree of naturalness.

Returning, therefore, to RMM's Viewpoints 1-5, I have taken into account these descriptions in my re-appraisal of the proposal's landscape and natural character effects:

Landscape Effects:

Viewpoint:	Effects Rating:	Relevant Factors That Have Influenced The Rating:
1.	Very Low	▪ Viewing Distance ▪ Very low visibility of the site & development on it ▪ No perceptible changes to the Perpendicualr Point landscape
2.	Very Low	▪ Viewing Distance ▪ Very low visibility of the site & development on it ▪ No perceptible changes to the Perpendicualr Point landscape
3.	Very Low	▪ The profile of the single cabins and lodge could rise just above the profile of the escarpment edge, although they appear likely to still be backed by the line of bush near the southern boundray of the lodge site ▪ No appreciable change to the landscape qualities of Perpendicular Point
4.	Moderate-high (initially) Low (long term)	▪ The panoramic overview of the site offered from this vantage point ▪ The distinctive profile and highly legible / memorable nature of Perpendicular Point ▪ Signs of existing modification near the current access track ▪ It is clear that the wider site has been cleared and used for farming in the past ▪ The relatively low profile of the proposed buildings – especially the single cabins, lodge, and lodge support building closer to the northern escarpment ▪ Their location near the existing access track and its 'disturbance' of an otherwise largely natural landscape ▪ Their small scale relative to that of the peninsular feature on which they would be located ▪ Their recessive colouring ▪ The likely part screening of some builidngs by the proposed planting – moreso in the long term (10 years plus) ▪ Enhancement of the site in general with the proposed planting
5.	Moderate-high (initially) Low (long term)	▪ The slightly peripheral nature of views towards the subject site – offset to the main viewing axis towards the coast and sea ▪ The visibility of the accessway running through the site suggests that at least some of the proposed buildings would be visible from this viewpoint, together with the car park (the photo supplied is not adequate to fully assess this) ▪ It is clear that the wider site has been cleared and used for farming in the past ▪ The recessive colouring and low profile of the buildings would help to bed them into the site ▪ The likely part screening of most builidngs by the proposed planting – moreso in the long term (10 years plus) ▪ Human activities across the site would be visible, but not intrusive ▪ Key qualities asssociated with a coastline that is otherwise dominated by bush, coastal landforms and the sea would be diminished, including its naturalness / intactness, aesthetic appeal, cohesion, and (perhaps) some of its cultural value as a natural promonotory and landmark ▪ These effects would be much more apparent initally, less so in the longer term

Natural Character Effects:

Viewpoint:	Effects Rating:	Factors That Have Influenced The Rating:
1.	Very Low	▪ No changes to the percieved natural character of the Perpendicular Peninsula coastline
2.	Very Low	▪ No changes to the percieved natural character of the Perpendicular Peninsula coastline
3.	Low	▪ The profile of the single cabins and lodge could rise just above the profile of the escarpment edge, although they appear likely to still be backed by the line of bush near the southern boundary of the lodge site ▪ This would give rise to a low level of change along the upper edge and skyline of the site's northern escarpment
4.	Moderate-High (initally) Low-Moderate (long term)	▪ The distinctive profile and highly legible / memorable nature of Perpendicular Point as a coastal feature and landmark ▪ Signs of existing modification down the length of the current access track and near it ▪ The site has been largely cleared and used for farming in the past ▪ The relatively low profile and recessive appearance of the proposed buildings – especially the single cabins, lodge, and lodge support building closer to the northern escarpment ▪ Their location near the existing access track and its 'disturbance' of an otherwise largely natural environment ▪ The likely part screening of most buildings by the proposed planting – moreso in the long term (10 years plus) ▪ Enhancement of the site in general with the proposed planting ▪ Awareness of the lodge and related buildings sitting 'in front' of the ONC Area running down its southern side and closer to SH6, subtly diminishing both its natural character and that of the wider coastline – moreso in the short to medium term ▪ Awareness of vehicle movements and activities associated with the lodge ▪ The largely incremental nature of these changes overall
5.	Moderate (initally) Low (long term)	▪ The recessive colouring and low profile of the buildings would help to bed them into the site ▪ Signs of existing modification down the length of the current access track and near it ▪ The site has been largely cleared and used for farming in the past ▪ The relatively low profile and recessive appearance of the proposed buildings – from the family cabins to the single cabins and lodge near the northern escarpment ▪ The location of much of this development near the existing access track and its 'disturbance' of an otherwise largely natural environment ▪ The likely part screening of most buildings by the proposed planting – moreso in the long term (10 years plus) ▪ Enhancement of the site in general with the proposed native planting ▪ Awareness of vehicle movements and activities associated with the lodge ▪ The incremental nature of these changes overall

These ratings are very similar to those identified by Ms Smetham, although the permanent changes to the site would result in slightly higher long-term ratings in relation to natural character effects. It should be noted that 'very low' is the lowest rating for effects employing *Te Tangi a te Manu's* rating scale, and I therefore agree with Ms Smetham that the proposal's effects in relation to Viewpoints 1 and 2 would be 'negligible'.

I also need to qualify my assessment of Viewpoint 5 by reiterating that the photos provided for Viewpoints 1, 2 and 5 are sub-standard from my point of view: they do not provide a sound basis for assessment – in particular, the image provided for Viewpoint 5. Photo simulations should also have been provided for Viewpoints 4 and 5, in my opinion.

4. Conclusions

4.1 Preliminary Findings

Acknowledging these shortcomings and using the material available, I tentatively agree with Ms Smetham that the longer-term landscape effects of the proposal are acceptable from a landscape standpoint. They would not result in a significant level of change to ONL45, more particularly in the longer term. As such, the landscape effects identified are also considered to be acceptable with regard to the various ODP and *Te Tai o Poutini* provisions addressed in the RMM Report, together with those identified in Section 3.2 (above) and NZCPS Policy 15(a) – which requires the 'avoidance' of adverse effects (of inappropriate development) on outstanding natural landscapes in the coastal environment. In this case, the long-term effects of the proposed lodge are deemed to be sufficiently low that it would meet the 'avoidance' test of Policy 15(a).

However, the situation in relation to natural character effects is more finely balanced. The lodge proposal would result in changes to the coastal environment of Perpendicular Point that peak at a moderate level in the long term, reflecting the reality that changes to that environment would arise from both structures and human activities in a cumulative fashion. Additionally, even though the proposed development would sit within an HNC Area, and physical modification would be isolated to that area, it would also abut the ONC Area of NCA42. There would be visual interaction between both areas, most notably when viewed from vantage points at and near Viewpoints 4 and 5.

Acknowledging this, it is also considered that the effects identified would remain below a 'significant' level (high) in terms of *Te Tangi a te Manu's* rating scale and this is consistent with NZCPS Policy 13(1)(b) in relation to the HNC Area of NCA43. On the other hand, the proposal would subtly erode some of the perceived (visual) naturalness of the adjoining ONC Area. However, this also has to be balanced against the gradual enhancement of the site, including its building curtilage areas, over time, and the reality that changes are always likely to occur near the interface with ONC Areas – even within neighbouring HNC Areas, as is the case here.

Taking all of these factors into account, it is my preliminary view that the lodge proposal would meet the test of Policy 13(1)(a), which again requires the 'avoidance' of adverse effects (of inappropriate development) on areas in the coastal environment that are identified as having outstanding natural character. It further means that the proposal would be aligned with Te Tai o Poutini's Polices CE-P2, CE-P3 and CE-P5, insofar as:

- The lodge development would be appropriately accommodated within the relevant ONL, HNC Area and ONC Area (CE-P2);
- The key elements, patterns, processes and qualities associated with the HNC and ONC Areas would be maintained (CE-P3);
- Significant adverse effects on natural character, natural landscapes, ONLs and ONC Areas would be avoided (CE-P3); and
- The proposed builidngs are of a size, scale and nature that is appropriate to the area (CE-P5); and
- Development would occur within parts of the coastal environment that have been historically modified by built development and primary production activities (CE-P5).

Finally, I need to emphasise that, like Ms Smetham, I have addressed the positive effects of planting and the related integration of the proposed buildings and areas of activity into their landscape and coastal setting. Thus, I have concluded that the proposed lodge would generate adverse effects that are of a moderate to moderate-high order for an initial 0-10 year period, reducing to a low level beyond that – in relation to both landscape and natural character effects. These time frames differ from those of Ms Smetham, as I believe

that the site's coastal location – exposed to significant winds and salt – will slow the maturation of the proposed planting. Regardless, I have ultimately put much more weight on the long-term effects of the *Punakaiki Wild* proposal in reaching my preliminary view that it is acceptable in terms of its landscape and natural character effects. As such, the proposal appears to meet both gateway tests posed by s.104D in terms of those effects.

4.2 Recommendations

Even so, I also need to reiterate that these preliminary findings have been reached using material that is not considered adequate in relation to best practice and the *Te Tangi a te Manu* / NZILA guidelines on landscape assessment. To address these shortcomings, it is my opinion that Ms Smetham's assessment needs to address both natural character values and effects on those values more directly in an updated report. That same report needs to evaluate such effects with reference to the relevant provisions of *TeTai o Poutini* and Policy 13(1) of the NZCPS. In addition, it needs to make it clear that the proposal is a Non Complying Activity and, as such, must be assessed against both limbs of s.104(D) – not the ODP's Assessment Criteria for a Discretionary Activity.

Furthermore, both that report and my preliminary review findings need to be better supported by additional graphic material, including:

a) Better quality viewpoint photos in an A3 (or larger) format – for Viewpoints 1, 2 and 5, in particular; and

b) Use of the panoramic image taken from Viewpoint 4 to clearly indicate the proposed location of all lodge buildings, car parking and planting areas, preferably accompanied by a photomontage / simulation showing the form and scale of the proposed buildings.

Stephen Brown

BTP, Dip LA, Fellow NZILA, Affiliate NZPI

NEW ZEALAND INSTITUTE OF LANDSCAPE ARCHITECTS
REGISTERED LANDSCAPE ARCHITECT

PUNAKAIKI WILD LODGE APPLICATION, TE MIKO

LANDSCAPE & NATURAL CHARACTER EFFECTS REVIEW ADDENDUM

Prepared For:

Hollis Planning & Buller District Council

Brown NZ Ltd

3rd June 2026

Introduction

This review is an Addendum to my previous (Brown NZ) Review Report prepared for Hollis Planning in March 2025. It addresses a range of information prepared in relation to the Punakaiki Wild Lodge proposal since that time, including submissions to the proposal. Consequently, in preparing this review the following material has been taken into account:

- *A s.92 RFI Addendum (29th April 2025) prepared by Rough Milne Mitchell Landscape Architects;*
- *The Revised Graphic Attachment (29th April 2025) prepared by Rough Milne Mitchell Landscape Architects;*
- *A response to Further Information Requests and a development proposal update (3rd May 2026) prepared by Town Planning Group;*
- *An amended Site Master Plan (22nd August 2025) prepared by Rough Milne Mitchell Landscape Architects;*
- *Amended lodge designs (10th July 2025) prepared by Ground Up Studio; and*
- *A s.92 RFI Addendum to the Landscape Architecture Report (2nd September 2025) prepared by Rough Milne Mitchell Landscape Architects; and*
- *Public submissions to the application.*

Key factors considered in relation to the updated proposal include:

a) The significantly reduced scale of the main lodge building, together with its redesign and division into two smaller buildings, and the removal of 3 proposed accommodation units;

b) Some related reconfiguration of the proposed development;

c) Concerns raised about the proposal in submissions, specifically related to its location in an ONL, an ONC Area and an HNC Area, including the related loss of 'naturalness' and 'de-wildness' of part of the Te Miko coastline, the erosion of 'dark sky' values, and impacts on the amenity of neighbouring Te Miko resident, Carolyn Hewlett;

d) RMM's response to concerns raised by Brown NZ (March 2025) in relation to Natural Character effects and RMM's evaluation of the proposal against relevant Buller District Plan (now Te Tai O Poutini Plan) provisions, Policy 13 of the NZ Coastal Policy Statement, and section 6(a) of the RMA.

In relation to the last point, it is noted that under the now dominant Te Tai O Poutini Plan provisions, the subject site remains within an ONC Area, an HNC Area, an ONL, as well as a Site of Significance to Māori. It is further noted that despite significant concerns being raised about the poor quality of photos of the application site produced by RMM in its AEE Report and the absence of any photo simulations to show what the proposal would look like from public vantage points (including SH6), no effort has been made to rectify this issue. More positively, however, it appears that the applicant has addressed the ecological concerns about development on the subject site that were raised by DoC.

Taking all of the above into account, this Addendum Report traverses the following matters before revisiting the Brown NZ findings of March 2025:

- The reduced scale, redesign and reconfiguration of the proposal and its effects – including on the naturalness and 'wildness' of Te Miko's coastal landscape;
- Impacts on the 'dark sky'environment;
- Impacts on Ms Hewlett's amenity; and
- A further review of the proposal against relevant Te Tai O Poutini Plan provisions (Landscape and Natural Character).

The Reduced Scale, Redesign and Reconfiguration of the Proposal:

In addition to significantly reducing and altering the profile of the Lodge, the revised proposal would remove one residential unit from the more exposed, northern coastal edge. It would also remove two accommodation units from near the southern site boundary. In my opinion, these changes would help to subtly reduce the profile of the lodge development as a whole, remembering that it was originally proposed to be 'encased' in a mixture of coastal forest and shrubland, riparian shrubland, wetland, and amenity planting – as shown on p.14 of RMM's *Revised Graphic Attachment (29th April 2025)*. In addition, I recognised the '*synergy between the site's gently rolling / undulating, terrace landforms and the profile of the proposed lodge*' in my March 2025 review report (Section 3.1).

As such, I reached the following conclusions about the proposal's landscape effects in relation to RMM's original viewpoints (1-5):

Viewpoint:	Effects Rating:	Relevant Factors That Have Influenced The Rating:
1.	Very Low	▪ Viewing Distance ▪ Very low visibility of the site & development on it ▪ No perceptible changes to the Perpendicualr Point landscape
2.	Very Low	▪ Viewing Distance ▪ Very low visibility of the site & development on it ▪ No perceptible changes to the Perpendicualr Point landscape
3.	Very Low	▪ The profile of the single cabins and lodge could rise just above the profile of the escarpment edge, although they appear likely to still be backed by the line of bush near the southern boundray of the lodge site ▪ No appreciable change to the landscape qualities of Perpendicular Point
4.	Moderate-high (initially) Low (long term)	▪ The panoramic overview of the site offered from this vantage point ▪ The distinctive profile and highly legible / memorable nature of Perpendicular Point ▪ Signs of existing modification near the current access track ▪ It is clear that the wider site has been cleared and used for farming in the past ▪ The relatively low profile of the proposed buildings – especially the single cabins, lodge, and lodge support building closer to the northern escarpment ▪ Their location near the existing access track and its 'disturbance' of an otherwise largely natural landscape ▪ Their small scale relative to that of the peninsular feature on which they would be located ▪ Their recessive colouring ▪ The likely part screening of some builidngs by the proposed planting – moreso in the long term (10 years plus) ▪ Enhancement of the site in general with the proposed planting
5.	Moderate-high (initially) Low (long term)	▪ The slightly peripheral nature of views towards the subject site – offset to the main viewing axis towards the coast and sea ▪ The visibility of the accessway running through the site, which suggests that at least some of the proposed buildings would be visible from this viewpoint, together with the car park (the photo supplied is not adequate to fully assess this) ▪ It is clear that the wider site has been cleared and used for farming in the past ▪ The recessive colouring and low profile of the buildings would help to bed them into the site ▪ The likely part screening of most builidngs by the proposed planting – moreso in the long term (10 years plus) ▪ Human activities across the site would be visible, but not intrusive ▪ Key qualities asssociated with a coastline that is otherwise dominated by bush, coastal landforms and the sea would be diminished, including its naturalness / intactness, aesthetic appeal, cohesion, and (perhaps) some of its cultural value as a natural promonotory and landmark ▪ These effects would be much more apparent initally, less so in the longer term

Reviewing the proposal again now, it is clear that the majority of development would remain near the western and northern coastal margins / edges of the subject site, and even with the proposed down-scaling of the Lodge, there would still be at least some awareness of the site's modification and development, as well as the movement of vehicles, headlights, and people near those edges once the lodge is operational. Such exposure would remain more marked in relation to views from SH6 as it runs down the coast from north to south, approaching Te Miko.

Consequently, the site's intrinsic naturalness and absence of development, together with the related rawness and 'wildness' of the Te Miko coast, would inevitably be eroded by the proposal – to an appreciable degree in the short-term, less so in the longer-term. The main mitigating factors in this regard would be:

- The fleeting nature of most views to the site – though not all, as some would be from natural stopping points on the coast next to SH6;
- The already modified nature of the site, which still reflects its past use for farming and grazing;
- The proposed bedding of the new Lodge building into the natural contours of the site – less so the more conventional residential units;
- Their recessive colouring; and
- Proposed planting around the Lodge and residential units near the coastal edge.

Reflecting on the ratings attributed above, I therefore remain comfortable with where they originally landed and consider that they still reflect the magnitude of effects associated with the revised proposal over time. For Viewpoints 4 and 5, it is still my opinion that the effects of the proposal would remain at a moderate-high level during and soon after construction, then gradually tail off as the scars of development heal and the proposed vegetation matures.

Turning to the matter of natural character effects, I also remain comfortable with my March 2025 ratings for all 5 viewpoints, which also remain as at that time:

Natural Character Effects:

Viewpoint:	Effects Rating:	Factors That Have Influenced The Rating:
1.	Very Low	▪ No changes to the percieved natural character of the Perpendicular Peninsula coastline
2.	Very Low	▪ No changes to the percieved natural character of the Perpendicular Peninsula coastline
3.	Low	▪ The profile of the single cabins and lodge could rise just above the profile of the escarpment edge, although they appear likely to still be backed by the line of bush near the southern boundary of the lodge site ▪ This would give rise to a low level of change along the upper edge and skyline of the site's northern escarpment
4.	Moderate-High (initally) Low-Moderate (long term)	▪ The distinctive profile and highly legible / memorable nature of Perpendicular Point as a coastal feature and landmark ▪ Signs of existing modification down the length of the current access track and near it ▪ The site has been largely cleared and used for farming in the past ▪ The relatively low profile and recessive appearance of the proposed buildings – especially the single cabins, lodge, and lodge support building closer to the northern escarpment ▪ Their location near the existing access track and its 'disturbance' of an otherwise largely natural environment ▪ The likely part screening of most buildings by the proposed planting – moreso in the long term (10 years plus) ▪ Enhancement of the site in general with the proposed planting ▪ Awareness of the lodge and related buildings sitting 'in front' of the ONC Area running down its southern side and closer to SH6, subtly diminishing both its natural character and that of the wider coastline – moreso in the short to medium term ▪ Awareness of vehicle movements and activities associated with the lodge ▪ The largely incremental nature of these changes overall

5.	Moderate (initally) Low (long term)	▪ The recessive colouring and low profile of the buildings would help to bed them into the site ▪ Signs of existing modification down the length of the current access track and near it ▪ The site has been largely cleared and used for farming in the past ▪ The relatively low profile and recessive appearance of the proposed buildings – from the family cabins to the single cabins and lodge near the northern escarpment ▪ The location of much of this development near the existing access track and its 'disturbance' of an otherwise largely natural environment ▪ The likely part screening of most buildings by the proposed planting – moreso in the long term (10 years plus) ▪ Enhancement of the site in general with the proposed native planting ▪ Awareness of vehicle movements and activities associated with the lodge ▪ The incremental nature of these changes overall

Although the changes to the lodge proposal would help to reduce its effects on the intrinsic naturalness of parts of the site, the greater bulk of proposed development would still impact that part of the site that is most sensitive in this regard, near its western and northern coastal edges – much as described in relation to landscape effects.

Impacts on The 'Dark Sky'Environment:

The issue of effects on Te Miko's 'dark sky' environment is complicated by the string of residential properties found down the coast north of Te Miko, but moreso the concentrations of residential and visitor accommodation development already apparent near Hartmount Place, then at Punakaiki – or the other way around, depending on one's direction of travel.

More statically, anyone living near the coast north of the subject site might well glimpse lighting on the Te Miko Peninsula, but typically over a significant distance, though and past intervening landforms and vegetation, while the enclave of housing around Hartmount Place would remain quite 'self-contained' and effectively isolated from lighting within the lodge site – both direct and ambient.

As a result, it is considered that the effects of lighting would be limited and largely incremental in nature. They would subtly compound awareness of the lighting already associated with the Te Miko and Punakaiki locality. As such, it is my opinion that lighting within the lodge facility would have a low level of effect, overall.

Impacts on Ms Hewlett's Amenity:

Ms Hewlett's submission makes it clear that her house lies south of the application site. As such, it appears to be separated from the site by the coastal forest and shrubland of the ONC Area that wraps around the site's old pasture, extending up to SH6. As such, it is hard to see how the proposed lodge, accommodation units and other buildings would be exposed to the Hewlett residence and have an impact on it. Even so, Ms Hewlett's submissions raises the following concerns:

a. *Concern that contours will not reduce visual effects, cabins on the northern edge will be visible from afar and main building will be distinctly visible*

b. *Reflection from roofs and windows will have a visual effect*

c. *Application incorrectly states that "the views from nearby dwellings are either significantly obstructed or non-existent" – there are views from property and dwelling across nearly the entire site. .....*

I have not visited the Hewlett Property, but the expanse of 'bush' between the subject site and the residential properties south of it – in Hartmount Place – suggests that the submission could well be focusing on more public views from SH6 and the coastline to the north, as opposed to any direct, inter-property effects. This appears to suggest that the proposal's effects on Ms Hewlett's amenity values – distinct from those on the public domain – would be of a very low order.

Review of The Proposal Against Relevant Te Tai O Poutini Plan Provisions:

In my review report of March 2025, it was acknowledged that RMM's original assessment addressed parts of *Te Tai o Poutini* (TTOP). In particular, it focused on NFL-01, NFL—P4, and NFL-P5 in relation to natural features and landscapes. However, it failed to directly address effects in relation to natural character values, and in this regard I pointed out that, in terms of NZCPS Policy 13(1) of the NZCPS, it is important to know if the proposed lodge would have an adverse effect on the ONC part of the site and/or a significant adverse effect on the natural character values of the 'other parts' of the local coastline, including its HNC area[1]. In this regard, I was particularly concerned about the RMM assessment's failure to address the following TTOP policies:

CE-P2 *Preserve the natural character, natural features and landscape qualities and values of areas within the coastal environment that have:*

a. *Significant indigenous biodiversity including Significant Natural Areas as described in Schedule Four*

b. *Outstanding natural landscapes as described in Schedule Five;*

c. *Outstanding natural features as described in Schedule Six;*

d. *High coastal natural character as described in Schedule Seven; and*

e. *Outstanding coastal natural character as described in Schedule Eight*

CE-P3 *Only allow new subdivision, use and development within areas of outstanding and high coastal natural character, outstanding coastal natural landscapes and outstanding coastal natural features where:*

a. *The elements, patterns, processes and qualities that contribute to the outstanding or high natural character or landscape are maintained;*

b. *Significant adverse effects on natural character, natural landscapes and natural features, and adverse effects on areas of significant indigenous biodiversity, areas of outstanding natural character and outstanding natural landscapes and features are avoided;*

c. *The development is of a size, scale and nature that is appropriate to the environment;*

CE-P5 *Provide for buildings and structures within the coastal environment outside of areas of outstanding coastal natural character, outstanding natural landscape and outstanding natural features where these:*

a. *Are existing lawfully established structures; or*

---

[1] ***Policy 13 Preservation of Natural Character***

(1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:

(a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and

(b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; ……

b. *Are of a size, scale and nature that is appropriate to the area; or*

c. *Are in the parts of the coastal environment that have been historically modified by built development and primary production activities; or*

d. *Have a functional or operational need to locate within the coastal environment.*

My review also included the TTOP Schedule 7 and Schedule 8 descriptions of these natural character areas:

ONC Area NCA42 Dolomite Point Pancake Rocks

Sequence of distinct rock formations including Dolomite Point Pancake Rock and Razorback Point as well as adjoining cliff faces.

- *Varied amalgam of raw and exposed landforms, rock stratification, blowholes, sheer cliffs, caves, and windswept vegetation impart a strong sense of naturalness.*
- *Striking interface with the Tasman Sea. Sheer cliffs plunge dramatically into the sea.*
- *Dramatic wave action, evident coastal erosion, and seasonal changes to atmospheric conditions are highly expressive and natural processes.*
- *Extensive flax vegetation cover across the rock formations along with pockets of lowland forest and stands of nikau.*

HNC Area NCA43 Perpendicular Point – Woodpecker Bay

An extensive assemblage of craggy headlands and points, rock shoals and outcrops interspersed with sweeping sandy / stony beaches, dunefields, vegetated in coastal scrub and forest.

- *High aesthetic values are associated with the inter- relationship between the series of craggy points and outcrops and the open waters of the Tasman Sea.*
- *Natural qualities are clearly evident in the amalgam of landforms, wind swept vegetation cover and their relationship with the Tasman Sea contributing to a very endemic landscape.*
- *Dramatic wave action, evident coastal erosion, and seasonal changes to atmospheric conditions are highly expressive and natural processes.*
- *The prominence of number of houses / batches and SH6 along the coastline affects the perceived intactness and cohesion of the coastal environment, however they do not overly detract from the highly expressive and natural processes that dominate the landscape.*
- *Backed by a steep escarpment covered in mature coastal forest.*

In my review report's Preliminary Conclusions, I implicitly took these policies and schedules into account in determining as follows:

…… the situation in relation to natural character effects is more finely balanced. The lodge proposal would result in changes to the coastal environment of Perpendicular Point that peak at a moderate level in the long term, reflecting the reality that changes to that environment would arise from both structures and human activities in a cumulative fashion. Additionally, even though the proposed development would sit within an HNC Area, and physical modification would be isolated to that area, it would also abut the ONC Area of NCA42. There would be visual interaction between both areas, most notably when viewed from vantage points at and near Viewpoints 4 and 5.

Acknowledging this, it is also considered that the effects identified would remain below a 'significant' level (high) in terms of Te Tangi a te Manu's rating scale and this is consistent with NZCPS Policy 13(1)(b) in relation to the HNC Area of NCA43. On the other hand, the proposal would subtly erode some of the perceived (visual) naturalness of the adjoining ONC Area. However, this also has to be balanced against the gradual enhancement of the site, including its building curtilage areas, over time, and the reality that

changes are always likely to occur near the interface with ONC Areas – even within neighbouring HNC Areas, as is the case here.

Taking all of these factors into account, it is my preliminary view that the lodge proposal would meet the test of Policy 13(1)(a), which again requires the 'avoidance' of adverse effects (of inappropriate development) on areas in the coastal environment that are identified as having outstanding natural character.

RMM also provided a response to this matter in its *s.92 RFI Addendum* of the 29th April 2025. In that Addendum, the following conclusions are reached in relation to TTOP Policies CE-P1, CE-P3 and CE-P5:

CE-P1:

With reference to schedules Five, Seven and Eight, the natural character and landscape values overlap to a high degree with a focus on the physical and experiential attributes present in common including the sequence and geomorphology of the landforms, dramatic interface and relationship with the Tasman Sea, legibility of coastal processes, presence of indigenous vegetation, natural character displayed in landforms and wind-swept vegetation.

It is considered that the proposed development will be comparatively small scale and will not interfere with the dramatic landforms including the skyline of the distinctive rock formations, nor the dramatic sea – cliff interface, legibility of coastal processes or wind-swept vegetation. While the introduction of built form will inevitably reduce the perception of natural character and wildness, the proposal is contained on a site that is modified by farming, by removing the natural indigenous landcover that could be expected on this site. The proposal will ensure that the indigenous vegetation cover will be restored to offset any adverse effects on natural character.

CE-P3:

As mentioned above, the proposed development will maintain the elements, patterns and processes and qualities that contribute to the ONL and HCNC and will avoid adverse effects on OCNC. But the proposed development will go further and improve the same within the site through retirement of farmland and active restoration of indigenous land cover. Despite the proposed development, the site will remain dominated by natural character pertaining to the coastal environment that may be confirmed with reference to the visual render from Viewpoint 4.

It is also considered that the size, scale and nature of the proposed development is appropriate given the absorption capacity of the site, including its undulating topography, the presence of existing and proposed indigenous vegetation in addition to the proximity of existing urban development to the site.

CE-P5:

As noted in the LAR, the development is in a part of the coastal environment that has been historically modified by built development and primary production activities. It is by default located in the coastal environment because most of the available and accessible private land on the West Coast lies within between the coastal hills and the Tasman Sea along the coastline.

The proposal is for visitor accommodation and therefore has an operational need to locate within the coastal environment. It is appropriate in terms of context, because the site is located 640m from the Te Miko subdivision and 2.25km from Punakaiki village, which has been developed as the access point for popular visitor attractions and the Paparoa National Park. Punakaiki village includes a campground and local tavern to support other tourist activities. Around 500,000 visitors per year pass through Punakaiki.

As a result, RMM's Addendum concludes that:

..... The above assessment considers the NZCPS and the relevant objectives and policies under the TTPP and finds that effects will be not be contrary to the relevant objectives and policies under both. This accords

with both gateway tests for non-complying activities where the LAR concluded that the adverse effects of the activity on the environment will be minor and the proposed activity will not be contrary to the objectives and policies of a proposed plan or plan.

Ms Smetham of RMM does not state if she has revised her original "*no – very low*" effects rating for natural character, but she does identify various factors that she considers contextualise that rating, including the former farming of the site, and the proposed planting across it. Having now had the opportunity to review the Addendum and its findings, I am now satisfied that RMM have addressed those findings with reference to the relevant TTOP policies and Policy 13(1) of the NZCPS. Our findings in relation to effects are still not entirely aligned, especially in the short-term, but I generally agree that the proposed lodge would comply with the policy framework described above.

Conclusions

It is my opinion that the changes made to the lodge concept would, as a whole, subtly improve the degree of 'fit' between the proposal and site from a landscape and natural character standpoint. However, for the reasons outlined above, this would not appreciably alter my 'preliminary conclusions', as described in my March 2025 review report. In that report, I concluded that:

..... the proposal would be aligned with Te Tai o Poutini's Polices CE-P2, CE-P3 and CE-P5, insofar as:

- *The lodge development would be appropriately accommodated within the relevant ONL, HNC Area and ONC Area (CE-P2);*
- *The key elements, patterns, processes and qualities associated with the HNC and ONC Areas would be maintained (CE-P3);*
- *Significant adverse effects on natural character, natural landscapes, ONLs and ONC Areas would be avoided (CE-P3); and*
- *The proposed builidngs are of a size, scale and nature that is appropriate to the area (CE-P5); and*
- *Development would occur within parts of the coastal environment that have been historically modified by built development and primary production activities (CE-P5).*

....., I have concluded that the proposed lodge would generate adverse effects that are of a moderate to moderate-high order for an initial 0-10 year period, reducing to a low level beyond that – in relation to both landscape and natural character effects. These time frames differ from those of Ms Smetham, as I believe that the site's coastal location – exposed to significant winds and salt – will slow the maturation of the proposed planting. Regardless, I have ultimately put much more weight on the long-term effects of the Punakaiki Wild proposal in reaching my preliminary view that it is acceptable in terms of its landscape and natural character effects.

In addition, RMM's Addendum Report responds to my concerns about the failure of its original assessment to address relevant natural character policies, both within TTOP and the NZCPS. Although differences remain between RMM's interpretation of the proposal's short-term effects and my own, we are generally more aligned in relation to its long-term effects and consistency with the relevant statutory framework addressing landscape and natural character effects.

Even so, I remain concerned that RMM has not provided the following, which were also addressed in my review report's Recommendations:

a) *Better quality viewpoint photos in an A3 (or larger) format – for Viewpoints 1, 2 and 5, in particular; and*

b) *Use of the panoramic image taken from Viewpoint 4 to clearly indicate the proposed location of all lodge buildings, car parking and planting areas, preferably accompanied by a photomontage / simulation showing the form and scale of the proposed buildings.*

In addition to assisting my review of the *Punakaiki Wild* proposal from a more technical perspective, such imagery would be very useful to help inform the local community about the nature of the proposal and its effects. I still consider it inappropriate that such material has not been provided.

It should be noted, however, that these concerns are primarily from a technical standpoint and relate to compliance with the NZILA's guidelines on landscape assessment in *Te Tangi a te Manu*. While RMM's failure to provide an appropriate range of high-quality photos of the application site has not assisted my review of the proposal, I have employed the information received, together with Google Earth and Maps, and photos taken in the course of my review of the West Coast Region's landscape values in 2011-12 and 2022, to reach the findings that are outlined in my original review report and above. I consider these to be accurate.

Stephen Brown

BTP, Dip LA, Fellow NZILA, Affiliate NZPI

ecoLogical solutions ltd
30 leigh street, kāeo
w: www.ecologicalsolutions.co.nz

ecoLogical Solutions
Environmental Consultants

To:	Jess Hollis, Hollis Planning
Date:	15 June 2026
From:	Dr Gary Bramley, Ecological Solutions Limited
RE:	Buller District Council Land Use consent application RC240079 by ACG Properties Limited

1. INTRODUCTION

ACG Properties Limited proposes to establish and operate a luxury lodge and visitor accommodation comprising a restaurant, bar and spa facility with 15 self-contained accommodation cabins, a worker accommodation building, a lodge support/utility building and associated access, parking, infrastructure and earthworks to be named 'Punakaiki Wild' across c. 21.9ha of former farmland located at 4663 State Highway 6, Te Miko, approximately 2km north of Dolomite Point on the West Coast of the South Island (hereafter referred to as 'the Site'). The hours of operation for the restaurant, lounge bar and spa are yet to be defined, but expected to be standard hours of Monday to Sunday 7am to 10pm. The proposal also includes indigenous revegetation (via both planting and natural regeneration) of parts of the Site.

The Site is located approximately 5km north of the only known tāiko (Westland petrel, *Procellara westlandica*) colony and birds leaving and returning to the colony would likely pass it. Tāiko are known to be disoriented by lighting and are commonly grounded, particularly between November and mid-January. Groundings can be fatal, but birds can also be rehabilitated and released.

The detailed lighting design for the site has yet to be determined. It is anticipated that small bollard lighting will be established along the cabin access tracks, with these being sensor activated and downward facing / shielded to avoid excessive light spill. A separate Environmental Lighting Report prepared by 3D Lighting Design accompanied the application and identifies potential lighting options for the site. A Lighting Management Plan ('LMP') is proposed to manage the specific lighting outcomes having regard to the opportunities to avoid and mitigate any adverse lighting effects on tāiko and other nocturnal birds.

The application to Buller District Council is for non-complying activities. Additional resource consents associated with earthworks and vegetation clearance are anticipated to be required from the West Coast Regional Council and will be applied for prior to any works commencing.

An Assessment of Effects prepared by Town Planning Group accompanied the application and was informed by an Ecological Impact Assessment ('the EcIA') prepared by RMA Ecology. The application included 'volunteered' proposed consent conditions, including in relation to preparation of the LMP.

You have asked Ecological Solutions Limited to undertake an expert technical review of the avifauna components of the ecological assessment, including the proposed consent conditions, including and the preparation of the LMP.

This memo serves to provide our response.

2. REVIEW METHODS

In preparing this advice, sections relating to avifauna in the following documents were reviewed:

- Desktop Ecological Values Assessment Memo, RMA Ecology, 26 August 2023.
- Landscape Assessment Report, Rough Milne Mitchell Landscape Architects, 20 December 2024.
- Application for Resource Consent to the Buller District Council, ACG Properties Limited, 29 April 2025 (Revision 1).
- Punakaiki Wild Development Environmental Lighting Report, 3D Lighting Design, 29 April 2025.
- Response to Further Information Request, Town Planning Group, 29 April 2025.
- Ecological Impacts Assessment ('the EcIA' RMA Ecology, 12 April 2026.
- Response to Further Information Request, RMA Ecology, 12 April 2026.
- Consultation with West Coast Penguin Trust, email dated 3 June 2026.
- Response to Further Information Request, RMA Ecology, 5 June 2026.

Below we have summarised the above material in relation to existing values of, and effects on, avifauna and then set out our findings in relation to the material provided, including any recommendations that we consider would improve effects management for avifauna in relation to the proposal.

3. SUMMARY OF ECOLOGICAL VALUES

The site is located within the Punakaiki Ecological District. The original vegetation of the Punakaiki ED comprised predominantly broadleaved hardwood forest. Original coastal vegetation comprised highly diverse broadleaved forest species including northern rata (*Metrosideros robusta*). The Punakaiki ED has remained largely unmodified throughout with the coastline, particularly at the Barrytown flats, being the most modified part. In terms of the Threatened Environment Classification, the Site is within Category 6 (>30% of indigenous cover remaining and > 20% of that legally protected, i.e. less reduced and better protected).

The gently to steeply undulating Site slopes west across approximately 60m altitudinal range with the steeper slopes adjoining State Highway 6 at c. 100m asl and the sea cliffs above the coastline at c. 40m asl. Incised and connected streams and gullies generally run east-west across the Site. Most vegetation comprised exotic pasture and pasture weeds including extensive areas of recently controlled gorse (*Ulex europaeus*). Around half of the Site comprises regenerating indigenous vegetation (i.e., mixed gorse/native shrubland, native shrubland and regenerating coastal forest) with 0.3ha of remnant coastal forest. The EcIA concludes that the native vegetation at the Site meets the criteria for ecological significance set out in the National Policy Statement for Indigenous Biodiversity ('the NPS-IB').

Habitat for birds within the Site included native forest, exotic scrub, grassland, cliff faces, native shrubland and vegetated cliff margins.

The EcIA used a combination of desktop and field methods to identify birds within 10 km of the Site, concluding 41 species were likely to occupy the site, including nine 'At Risk' or

'Threatened' species, either confirmed or considered likely to be using the Site. In particular the 'At Risk (declining)' mātātā (South Island fernbird, *Poodytes punctatus*) and 'Threatened (nationally vulnerable)' spotted shag (*Phalacrocorax punctatus*) and koekoeā (long-tailed cuckoo, *Urodynamys taitensis*) were confirmed present, with a breeding colony of spotted shags on the cliff faces. The 'At Risk (declining)' kororā (little blue penguin, *Eudyptula minor*) was considered likely to be present.

Tāiko calls were recorded by the acoustic recorders at the Site. Tāiko are considered to be 'At Risk (naturally uncommon)'. Tītī (sooty shearwater, *Ardenna grisea*), which are regarded as 'At Risk (declining)' were also recorded.

Roroa (great spotted kiwi, *Apteryx maxima*) were not detected during the surveys but are likely to be resident in surrounding forest.

The EcIA concluded that the Site has 'high' ecological value for birds. Based on the presence of nationally 'threatened' species (including koekoeā and a breeding colony of at least 13 pairs of spotted shag) either permanently or seasonally, Table 5 of the EIANZ guidelines indicate that the Site has 'very high' ecological value with respect to birds.

4. ECOLOGICAL EFFECTS MANAGEMENT

The EcIA sets out the application of the effects management hierarchy by the Applicant which is summarised in Table 1. The EcIA concludes that the proposal will result in a 'very low' or 'net gain' overall level of effect following mitigation.

Table 1: Ecological Effects Assessment (from the EcIA).

Ecological Value	Level of effect (pre mitigation)	Effects Management	Level of effect (post mitigation)
Damage to, or death of, native birds/eggs/nestlings during vegetation clearance	Very Low	Avoidance of vegetation clearance during breeding season	Very Low
Loss of native bird habitat (scrub)	Very Low	Mitigation of vegetation loss via riparian planting. Ecological Solutions Limited notes that additional revegetation is also proposed.	Net Gain
Injury or death of Westland petrel due to lighting leading to disorientation and grounding. The Lighting Report states that the intent is to operate all lighting from dusk through to approximately 1 hour past the Lodge closing time (i.e., 11pm) after which lights will turn off and revert to motion-detection mode.	High	Avoidance and mitigation of impacts via implementation of a Lighting Management Plan	Very Low
Disturbance of nocturnal birds (koekoeā. roroa, kororā, tītī) due to lighting. The Lighting Report states that the intent is to operate all lighting from dusk through to approximately 1 hour past the Lodge closing time (i.e., 11pm) after which lights will turn off and revert to motion-detection mode.	High	Avoidance and mitigation of impacts via implementation of a Lighting Management Plan	Very Low
Injury or death to kiwi due to domestic pests	High	Ban domestic cats. Ban visitors from bringing pets. Dogs belonging to staff must be kiwi aversion trained. Ecological Solutions Limited notes that other flightless birds such as kororā and weka will also be affected by domestic pets.	Low
Disturbance of spotted shag colony during construction	Very low	The colony is beyond the zone of influence. Nothing proposed.	Very low
Disturbance of coastal and forest birds due to drones	High	Avoidance by prohibiting use of drones by guests and the maintenance of 100 m distance from any birds for drones used by staff or contractors for monitoring or marketing purposes.	Very Low

6. POTENTIAL EFFECTS ON AVIFAUNA

The proposed vegetation clearance avoids existing fernbird habitat and the spotted shag colony (which is located on the adjoining cliffs).

As set out in Table 1, the EcIA considers that adverse effects on avifauna prior to mitigation would be 'very low' for bird habitats (due to vegetation clearance), eggs/nestlings/birds (due to vegetation clearance) and the spotted shag colony (due to noise and other disturbance during construction). Specific mitigations are proposed for these effects and these are generally appropriate and achievable. Given the small scale of clearance and the scale of the revegetation proposed, as well as avoidance of vegetation clearance during the breeding season, the identification of a 'very low' level of adverse effects on nesting species and native bird habitat is appropriate.

Table 1 also sets out that unmitigated effects would be 'high' for nocturnal birds (due to lighting), high for roroa (due to domestic pets, which we note would also affect other ground dwelling species which are not mentioned in that context in the EcIA), and high for coastal and forest birds (due to drone use).

In addition to the effects set out in Table 1, there is also a risk that any kororā crossing the site to access breeding burrows or return to the sea for feeding could be disturbed or injured during construction. If kororā are crossing the site, this could be a 'high' level of effect locally.

In our view the mitigations proposed could go further to protect the species identified from the anticipated effects including:

1) The EcIA recommends a ban on domestic cats and visiting dogs, and that resident dogs be kiwi aversion trained. The West Coast Penguin Trust suggest that resident dogs should also be penguin aversion trained. Aversion training is not completely successful and kiwi and penguin aversion training would not reduce the risk to weka or other ground dwelling species. Predation of native ground dwelling birds could be avoided by a ban on all domestic pets within the Site.
2) Implementation of the LMP would reduce the risk to seabirds. Given that the risk of grounding is strongly seasonal, and that lighting is proposed to be used until at least 11pm year-round, additional measures relating to seasonal use of lighting could assist in reducing effects. Furthermore, we recommend inclusion of an accidental discovery protocol which sets out how any grounded birds would be dealt with. This would further reduce the risk of adverse effects on birds affected by lighting.
3) There is a risk that kororā might either be already using burrows within the Site (accessing from the area north of the cliffs) or come to occupy piles of construction materials at the Site during works. If present, kororā could be adversely affected by vegetation clearance, earthworks and/or construction (depending on their specific location). This could be mitigated by specific penguin surveys in advance of construction or daily penguin checks during works.

7. PROPOSED CONSENT CONDITIONS IN RELATION TO AVIFAUNA

Table 2 provides a summary of the draft proposed ('volunteered') consent conditions as they relate to avifauna and also sets out amendments using strikethrough text for suggested deletions and red text for suggested insertions. These amendments are intended to more effectively mitigate potential adverse effects on birds.

Table 2: Suggested amendments to Draft Proposed (Volunteered) consent conditions relevant to avifauna

Condition		Identified effect	Comments
6	~~The use of drones by guests of the lodge and visitor accommodation activity is prohibited. Advice Note: a) This condition does not restrict the use of drones associated with ecological monitoring, site investigation, maintenance, emergency response, or marketing purposes, provided the drone use is operated in accord with Department of Conservation protocols (including maintaining a 100m distance between any coastal birds and the drone), and any necessary authorisations are obtained from the Department of Conservation.~~ a) The use of drones by guests of the lodge and visitor accommodation activity is prohibited. b) Drones may be used for ecological monitoring, site investigation, maintenance, emergency response, or marketing purposes, provided that the drone must: a. Be used outside the breeding season (October – February) except in emergency situations. b. Take off and land at least 100m from any wildlife. c. Fly no closer than 50m from any wildlife. d. Not fly over roosting/nesting birds e. Not hover or maintain a continuous position over any wildlife. f. Be landed immediately and cease operation if any birds repeatedly circle or engages directly with the drone.	a. Disturbance of coastal and forest birds due to drones	We note that some birds will be attracted to a drone and likely try to attack it. Maintaining a 100m setback from any/all coastal birds is impractical and probably ultimately unenforceable if birds approach the drone. We suggest any drones should be used outside the breeding season (except in emergencies) and the operator be required to operate the drone so as to minimise effects, including maintaining operational distance and being required to cease if birds are attracted. Acknowledging that the Department of Conservation administers adjoining conservation land, the need to obtain Department of Conservation authorisations to operate on private land could add substantial delay to any activities. This is likely unworkable. The Department of Conservation protocols in relation to wildlife state: You may fly the drone near or over wildlife but when doing so you must: • Take off or land at least 100m from any wildlife. • Fly no closer than 50m from any wildlife. You must not fly the drone over roosting/nesting birds. You must not hover or keep the drone in a continuous position over any wildlife. If any wildlife repeatedly circles or engages directly with the drone, for example dive bombs, you must land the drone immediately and cease the drone operation. These are slightly inconsistent with Condition 6 as proposed. The amended condition addresses this inconsistency and provides more certainty and arguably negates the need for a separate

			Department of Conservation authorisation (unless drone use on public conservation land is proposed).
7	No cats or dogs shall be kept on the site., ~~except for dogs owned by staff residing on the site that have completed kiwi aversion training recognised by the Department of Conservation prior to being brought onto the site, and evidence of that training shall be provided to the Council on request.~~	a. Effects on roroa	Domestic pets also pose a significant threat to weka and little blue penguin. Dogs (except working conservation dogs) and cats should be excluded from the property. Noting that the West Coast Penguin Trust (email dated 3 June 2026) has suggested resident dogs be required to undergo penguin and weka aversion training, this method is not completely effective, but is better than nothing if a total ban is not palatable.
9	Prior to the commencement of any construction works on the site, a ~~Vegetation and Pest Management Plan (VPMP)~~ Biodiversity Management Plan shall be prepared by a suitably qualified and experienced ecologist and/or landscape professional and provided to Council. The ~~VPMP~~ BMP shall identify measures to achieve these objectives and shall, as a minimum, address the following matters: a. Identification of all existing indigenous vegetation to be retained and protected; b. Details of all proposed revegetation and restoration planting, including plant species, plant sizes, spacing, staging, timing and maintenance requirements across both the construction and operational stages of the project; c. Details of restoration activities proposed to be undertaken across the site, including any riparian, wetland, shrubland or indigenous habitat enhancement works, and specifically the provision of restoration planting to a width of 5 metres along the margins of Stream 3 and the enhancement of habitat around wetland areas W3, W4, W5 and W6;	a. Damage to, or death of, native birds/eggs/nestlings during vegetation clearance b. Loss of native bird habitat (scrub) c. Injury or death of native penguins due to earthworks and construction	Expansion of the scope of the VPMP to accommodate provisions for incidental discovery protocols grounded seabirds (including tāiko) and management of kororā would obviate the need for a separate Avifauna Management Plan. We suggest the following revisions and additions: Areas W3, W4, W5, and W6 are identified in the EcIA. Western weka, black-backed gull, Australasian harrier and morepork are at risk of primary and secondary poisoning from uncontained baited brodifacoum and weka and roroa are at risk of being trapped in inappropriately set traps. Control methods should aim to avoid non-target mortality.

	d. Confirmation that, where practicable, native plant species used for revegetation, restoration and enrichment planting shall be eco-sourced from local nursery suppliers; e. Measures to control and manage pest plant species and animal pests during construction and operation of the lodge and visitor accommodation activity. Animal pest control operations should specifically set out appropriate methods for mammalian pest control given the presence of western weka, roroa, black-backed gull, Australasian harrier and morepork; f. Details of consultation undertaken with the Department of Conservation, the owners and occupiers of the adjacent property at 4655 State Highway 6, and any relevant community restoration groups, in relation to pest management and planting restoration opportunities across the site; g. A description of the proposed vegetation clearance methods, including progressive mowing of grassland areas prior to excavation where appropriate; h. Measures to avoid vegetation clearance during the native bird nesting season, generally between October and February, unless otherwise approved by a suitably qualified ecologist. Ecologist approval during the breeding season must be informed by a pre-clearance nest survey undertaken no more than 14 days prior to clearance and including survey of all vegetation to be cleared, including pasture where species such as South Island pied oystercatcher may nest; i. Methods for vegetation clearance within shrubland areas, including use of hand tools where appropriate and relocation of cut vegetation to adjoining areas to enable fauna dispersal prior to mulching or disposal; j. Measures to ensure there is no vegetation clearance within 20 metres of locations recorded for fernbird, as identified in the Detailed Ecological Report submitted with the application; k. Ongoing monitoring, maintenance and replacement requirements for planting, including replacement of any dead or diseased plants; and		

	l. Long-term management obligations for pest control, planting establishment, vegetation maintenance and ecological enhancement works. m. Incidental Discovery Protocols for any grounded seabirds. These protocols should include recovery protocols for grounded, injured or deceased Westland petrel reporting processes and methods to reduce the likelihood of further groundings where achievable. n. Methods to avoid effects on any resident kororā and protocols for dealing with any injured or deceased penguins discovered.		
10	Prior to the commencement of operation of the lodge and visitor accommodation activity, a Lighting Management Plan (LMP) shall be prepared by a suitably qualified ecologist in consultation with a suitably qualified lighting professional and provided to Council. The objectives of the LMP shall be to ~~manage~~ reduce the effects of lighting on wildlife (~~specifically~~ including but not limited to the Westland Petrel) and amenity values, and to ensure that all lighting associated with the lodge and visitor accommodation activity is designed, installed and operated in accordance with best practice lighting principles. All lighting shall be designed, installed and operated in accordance with the LMP. The LMP shall, as a minimum, address the following matters: a. A description of the location, height, type and specification of all proposed lighting installations; b. Measures to ensure all exterior lighting is directed downward, shielded to avoid light spill, and designed to minimise effects on ecological values and wildlife, including consideration of the Australasian Government's National Light Pollution Guidelines for Wildlife January 2023 and Australasian Dark Sky Alliance (ADSA) Guidance; c. The use of lighting with a colour temperature no greater than 3000K, filtered where practicable to reduce blue and violet wavelengths; d. Measures to ensure fixed exterior lighting is mounted as close to the ground as practicable, and that lighting is limited to the minimum necessary for safety, access and operational purposes, including the use of light-	a. Injury or death Westland petrel, tītī or other seabirds due to grounding b. Disturbance of nocturnal birds due to lighting	Westland petrel (tāiko) are not the only species affected by grounding. Tāiko groundings are strongly seasonal and additional restrictions on lighting in the November – January period may be achievable.

	minimising technology, motion sensors, timers or dimmers where practicable; e. Measures to avoid adverse effects of lighting on any wildlife present on or around the site, including identification of any light-sensitive species, any seasonal or diurnal patterns in grounding behaviour and specific management actions to protect those species; f. Measures to manage light spill from interior lighting, including consideration of supplementary control measures focused on the building envelope, including specialist glazing options and/or window films designed to attenuate blue wavelength transmission and reduce ecological effects associated with interior light spill; g. Details of operational controls for interior lighting, including dimming, scene-setting and reduced night-time light levels during periods of lower occupancy or overnight use; h. Details of consultation undertaken with the Department of Conservation and local ecological interest groups in relation to the preparation of the LMP, including a summary of feedback received and how that feedback has been addressed; i. Monitoring, maintenance and reporting procedures to confirm ongoing compliance with the LMP, and a framework for responding to complaints or queries regarding lighting effects from adjoining landowners, stakeholders or the wider community. The LMP shall be implemented prior to the operation of any lighting and maintained thereafter for the duration of the activity.		

8. SUMMARY

Notwithstanding the generally minor matters identified above, the EcIA identifies the main effects on birds. The misclassification of the site as 'high' value for birds, rather than 'very high' does not make a material difference to the conclusions because the effects can generally be appropriately managed. Having said that, the volunteered consent conditions could be improved to provide more certainty with respect to outcome.

We have suggested amendments to the draft proposed consent conditions because:

- Consent Condition 7: Uncontrolled dogs are a significant predator of both western weka (*Gallirallus australis australis*) and kororā. The originally proposed conditions do not mitigate the risk to these species.
- Consent Condition 9: Expanding the scope of the proposed 'Vegetation and Pest Management Plan' to further mitigate potential adverse effects on avifauna seems a more pragmatic approach than requiring a separate avifauna management plan. Discussion about mammalian pest control in the EcIA focuses on control of stoats as a significant threat to the spotted shag (*Phalacrocorax punctatus*) colony, using both manual trapping and poison baits. Ground based poison baits present a significant threat of primary poisoning to species such as western weka, black-backed gull (*Larus dominicanus*) and Australasian harrier (*Circus approximans*) (Eason and Spurr 1995). In addition, native species such as ruru (*Ninox novaeseelandiae*) and Australasian harrier are also at risk of secondary poisoning. Provision for mammalian pest control within the Biodiversity Management Plan should consider these effects when selecting pest control options for this Site to avoid non-target mortality of native species.
- Consent Condition 9: RMA Ecology noted specific provision for pre-clearance nest checks to be performed by a qualified ecologist in their memo of 5 June 2026. This was apparently not carried through to the draft proposed conditions.
- Consent Condition 9: Incidental Discovery Protocols for grounded seabirds would clearly articulate processes to be followed should any grounded birds be discovered

Subject to the suggested amendments to the consent conditions outlined above, I agree with the EcIA conclusion that the proposal will result in a 'very low' or 'net gain' overall level of effect on avifauna following mitigation.

I trust that this assists your deliberation. Please don't hesitate to contact me if you have any questions.

9. REFERENCES

DCCEEW, 2023. National Light Pollution Guidelines for Wildlife, Department of Climate Change, Energy, the Environment and Water, Canberra, May CC BY 4.0.

Department of Conservation, 2025. Dog vs Wildlife Report, Media Release, September 2025.

Eason, C.T. and Spurr, E.B. 1995. Review of the toxicity and impacts of brodifacoum on non-target wildlife in New Zealand, New Zealand Journal of Zoology, 22:4, 371-379.

Marchant, S.; Higgins, P.J. (eds) 1990. Handbook of Australian, New Zealand & Antarctic birds. Vol. 1, ratites to ducks. Oxford University Press, Melbourne.

Waugh, S.M.; Bartle J.A. 2013 [updated 2022]. Westland petrel | tāiko. In Miskelly, C.M. (ed.) New Zealand Birds Online.