

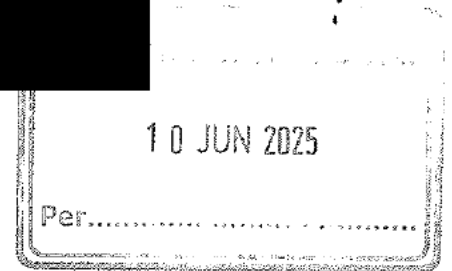
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MSE:

Submission on: 'Punakaiki Wild'
Applicant: ACG Properties Ltd
Address: C/ Daniel Thorne Town Planning Group (NZ) Limited,
PO Box 2559, Queenstown 9348
Application number: RC240079
Location: 4663 State Highway 6, Te Miko, Punakaiki

Submission from: Marie Elder
Postal address: [REDACTED]
Email: [REDACTED]
Phone: [REDACTED]

I oppose the application in its current form.

I wish to speak to my submission.



INTRODUCTION

1. I am not opposed to this type of development per se, especially as it is for low-density accommodation and appears relatively unobtrusive. I am also aware some local people are already eyeing employment possibilities.
2. I appreciate the applicant's decision to request public notification, although I am not aware of any distributed information nor an invitation to a community meeting.
3. It is true the site has already been modified, and the proffered indigenous revegetation, along with removal of exotic vegetation and pest control, could have long-term benefits to the natural character and biodiversity of the site. It is good to see "*the specific species proposed ... uphold the integrity of the local ecological character and restore Ngāi Tahu taonga species to the site*" [Application p89]
4. However, 'Punakaiki Wild' would be significant human development, non-complying with BDC Paparoa Character Area rules on multiple fronts, and with draft TTPP rules and the West Coast Regional Land and Water Plan. New developments should work within the parameters of these rules and plans, respecting the site's setting within a sensitive natural environment.
5. The application as it stands is incomplete, relying heavily on future management plans and, importantly, on "*detailed designs to come*" [my emphasis]. Consent from WCRC has not yet been sought [p57].

REASONS FOR OPPOSING:

- An incomplete application
- Unsupported assumptions
- Factual errors
- Transport
- Other issues

AN INCOMPLETE APPLICATION

Approvals yet to come

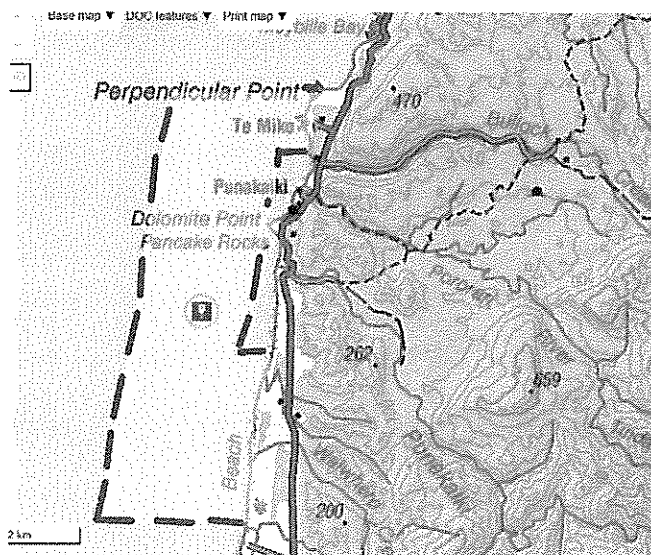
6. I have been unable to find written approval from Ngāti Waewae, Waka Kotahi [NZTA, for site access], the NZ Fire Service, or DOC¹

Detailed [or initial] designs yet to come ...

7. The application acknowledges many features are yet to be designed in detail. They include stormwater management [p30], lighting pp32&84, earthworks p32, specific foundation designs [p33] topography [p85], an engineering solution to access gradient [p87], dust management [p35], a CMP to manage “dirty water” [p87], and geotechnical mapping of hazard areas [p90]. I consider consent cannot be granted without these.
8. A living roof and bunding are each cited once [pp81 and 120 respectively], as asserted mitigation for adverse visual effects, but with no design details for either, the mitigation claim does not stand. A living roof is not something that can just be popped on top.

The Punakaiki Marine reserve, est. 2014

9. The application is silent on the site’s immediate proximity to the Punakaiki Marine Reserve, which starts at Perpendicular Point and extends to the Barrytown Flats, covering 35square kilometres. See map.
10. I wonder which beach the applicant plans to excavate for the lodge’s “*textured flute render mixed with a high content of local beach pebbles*” [p22]. This is just one of the implications of developing accommodation in proximity to the marine reserve, established to protect a wide variety of marine species and habitats.



Helicopter transport

11. I understand the applicant has links to the Lindis Group, who use helicopter transport at tourist accommodation elsewhere. This application does not mention helicopters. However, I understand that when a neighbour asked recently about the possibility of their being used, the response was equivocal: words to the effect of “*Not at this stage.*”²
12. I believe any possibility of establishing a helipad on the site at any time in the future needs to be part of this resource consent application. It would be strongly opposed: helicopters

¹ An enthusiastic initial email does not constitute formal approval.

² Citing a conversation between Carolyn Hewlett and Ant Beale of AB Consulting, early June 2025

are an anathema to the Paparoa Character Area; the adjacent Paparoa National Park; the adjacent Punakaiki Marine Reserve; the neighbouring Scenically Sensitive Residential area; the biodiversity of the site and its surrounds; and the fledgling Dark Sky Project.

13. If the applicant hopes for a social licence to operate within the community, they need to be upfront about any possibility of helicopter use or be prepared to eliminate the possibility through iron-clad conditions.

Safety measures

14. I cannot find any detail on safety measures, despite the plan to combine licensed premises with accommodation close to cliff edges and highly exposed to storm events.

Emergency planning

15. Some of the site lies on previous rockfall, and it is all under the Hinekakai bluffs and on a coastal cliff. What might happen to the site in an AF8 event? I cannot find plans for how guests and staff will be cared for in a civil defence emergency, which might well see the site isolated and without power for some days or weeks.

Immediate neighbours

16. Carolyn Hewlett and Will Smith live at 4655 Coast Rd. The application mentions this residence only as having an access 40m away. It gives no 'viewpoint imagery' from #4655, whereas five more distant viewpoints are carefully photographed and annotated.
17. Much of the site is visible from the house and deck at #4655. The six cabins to the SE, and the lodge itself, would be visible. Residents would be affected by lighting, by moving car headlights, by accessway vehicle noise, and by the noise of 140 people at a function.
18. The assumption of '*unlikely ... confusion*'³ between driveways separated by 40m is negated by the confused experience of tourists who already turn into the #4655 driveway assuming it is the way to the beach, or to Hartmount Place accommodation.

UNSUPPORTED ASSUMPTIONS

19. I cannot find supporting data for several assumptions in the application, including:

- *"It has been recognised that Punakaiki has a severe lack of visitor accommodation offerings, particularly in the luxury market"* p11⁴
- *"... speeds will be lower than 100kph"* p85 and *"... the volume of vehicles on the road are [sic] modest"* p85. The Transport Report also asserts this low speed [p3], also without support.
- *"... the proposal will facilitate land to be used ... in meeting the needs of the community"* [p129]. How exactly have our 'needs' been established, I wonder?

³ Transport Assessment 8.2.3 and 9.6

⁴ Note approximately 100 beds 'for sale' nightly in Hartmount Place alone, 600m away. Some are high-end.

FACTUAL ERRORS

Other assertions are factually incorrect and therefore misleading. They include:

20. *“the highway ... is not used by heavy vehicles”* p85. But it is: by milk tankers; freight trucks including truck and trailer units; tourist buses; large camper vans. The vehicle counter at Canoe Creek records an annual average daily traffic count of 786 vehicles, 11% [88] of which are heavy vehicles⁵. Most of these heavy vehicles will also pass the site.
21. The application claims to comply with BDC Paparoa Character Area Rule 6.3 [p45] but there is no plan or design for bunding the hazardous substance storage.
22. The application claims *“As the site is located on a State Highway there will be no pedestrian traffic present ... no additional infrastructure required to support pedestrians or cyclists”* [p86]. But this is not a standard state highway: the cyclists, walkers, hitchhikers, and tourist photographers regularly seen would apparently need to just take their chances with the extra tourist traffic.
23. The application claims *“The access is to remain in the same location ... therefore will have no additional effects on the amenity and safety of neighbouring properties”* [p86]. This ignores the additional adverse effect of far more vehicles using the access.

TRANSPORT ASSESSMENT – Conveyance Consulting

24. The issue of transport is of particular concern to me and the transport assessment provided by Conveyance Consulting does not reassure.

Dubious premises and assertions

25. There is no data to support an assertion there is so little SH6 traffic *“access will operate under free flow’ conditions”* [p4]. I live 600m to the south and ‘free flow’ seems to imply I could pull out onto SH6 without looking and usually get away with it. This is not the case.
26. There is no support for the rather odd assumption guests will seldom come and go during the day because, having have chosen to stay in a *“remote place ... their extent of trip-making will be reduced”* [p7]. Arguably the exact opposite is true ... rather than sit about on site all day, they’ll pop out to explore the area, visit the Pancake Rocks and Punangairi, enjoy the Paparoa Experience, walk Truman Track, walk the Pororari River Track, stop for souvenirs at Dolomite Point, visit beaches, go to the local market.
27. The report says *“sightlines ... [are] constrained due to the vegetation”* [p3]. They are, but not as much as by the nearby bends. It is a dangerous access.
28. Anyone who states there are *“no bus services”* [p3] cannot have noticed the two daily public buses: the East West Shuttle and InterCity, nor the numerous seasonal tourist buses.
29. The calculations and numbers given throughout Section 6 for expected vehicle movements leave me baffled. The writer concludes *“Overall then ... 99 vehicles per day”*

⁵ Mike Harding, in his Review – Terrestrial Ecology, 12 Dec 2023 for the TiGa Minerals and Mining resource consent application, Barrytown.

[p7] but I cannot see how that number is generated from the previous figures. And, no estimate is given for heavy vehicles servicing the site, nor staff vehicle movements, just a passing reference to "plus staff travel" [p8]. Throughout, the writer tends to minimise likely vehicle movements.

30. The report states "*there is an engineering solution whereby the initial steeper section of the access is flattened, and the flatter section is steepened, such that the driveway overall provides the expected 1 in 5 maximum gradient*". It would have been useful to see this engineering design as part of the application.

31. Perhaps most perplexing is the vagueness of the final assertion regarding sightlines: "... based on a more detailed assessment in future ... at this stage it is not expected that there are any reasons why sight distances that are appropriate for the prevailing operating speed of the highway could not be achieved" [p9]

OTHER ISSUES

Lighting

32. The lighting report from 3D Lighting Design Ltd notes the presence of sensitive wildlife such as the national threatened Westland petrel but gives only "*high level details around the potential lighting outcomes*" [Application p84]. I cannot find the necessary specific details on, or the applicant's commitment to, minimisation of site lighting and avoidance of light spill, particularly to protect the Westland petrel.

33. The 2024 resource consent for TiGa Mining and Minerals to operate on the Barrytown Flats offers a good case study of lighting requirements to protect the Westland petrel.

Punakaiki water supply

34. The applicant expects to hook into the Punakaiki supply, with flow "*from the Council's reticulated water supply of about 18m³/day*" [p30]. This supply is vulnerable to persistent sabotage, and I am concerned about the demands of another large user near its source.

Benefits to local or regional economy

35. I acknowledge there may be some benefit from workers and guests spending in local businesses. However, the provision of an in-house restaurant and bar indicate local hospitality businesses can expect to benefit little.

CONCLUSION

For the above reasons, I oppose the application in its current form and therefore wish for consent to be declined.

I look forward to presenting in more detail at a hearing.

Thank you for the opportunity to submit.

Marie Elder
Te Miko, Punakaiki

09/06/25

Punakaiki Wild submission June 2025 Marie Elder