



TOWNPLANNING GROUP

29 April 2025

Jess Hollis
Consultant Planner
Buller District Council

VIA EMAIL: jessica@hollisplanning.co.nz

Dear Jess,

RESPONSE TO FURTHER INFORMATION REQUEST – RC240079 – 4663 STATE HIGHWAY 6, TE MIKO, PUNAKAIKI

This letter is in response to your letter dated 7 March 2025 in which further information was requested (**RFI**) in relation to the Punakaiki Wild resource consent application, assigned the Buller District Council (**BDC**) reference 'RC240079'. We respond to the various points raised below, with this response supported by additional reporting / plans, and associated and corresponding revisions to the Assessment of Environmental Effects (**revised AEE**) and associated supporting attachments. The complete response to the RFI and revised AEE is available at the following SharePoint Link:

SHAREPOINT LINK: [PUNAKAIKI WILD - RFI, REVISED AEE AND SUPPORTING DOCUMENTS](#)

Our response to the RFI follows, with the specific RFI points noted for clarity.

GENERAL

- 1. Function Centre. The traffic assessment provided with the application refers to the lodge also being utilised as a function centre; however limited details are provided in the application document. Provide additional details and assessment of this aspect of the application, including frequency and scale of events, potential operating hours, potential for noise generation and other effects.*

The Applicant is not proposing to operate the lodge as a function / event centre, with this clarified in the revised AEE. This position reflects the practical challenges involved in providing

for such events whilst providing for accommodation outcomes across the site with multiple independent guests. It is expected that events could only feasibly occur if an entire 'book-out' of the lodge / accommodation was undertaken, with such outcomes already assessed within the AEE.

2. The application refers to the maximum height of the proposed lodge being well within 5.5 metres above the original ground level, please confirm the proposed maximum height of the building.

The height of the lodge varies across its profile / section, with this reflective of the existing ground level and the proposed cut heights. However, as identified in **Figure 1**, the proposed maximum height of the lodge is 5.14m above the existing ground level, with the majority of the lodge building notably lower.



Figure 1 Lodge Cross Section

3. The application details "There is a single instrument registered on the Record of Title, with this relating to a right of way easement in favour of Buller District Council (Council), with this providing rights of access to their water supply infrastructure that serves Punakaiki". Please confirm/show where this is located.

A copy of the Gazette Notice 12988793.2 and SO 504661 is enclosed and appended as part of **Attachment [B]** to the revised AEE, with the easement area shown in **Figure 2**. This easement area is located on the opposite side of SH6 from the main development site.

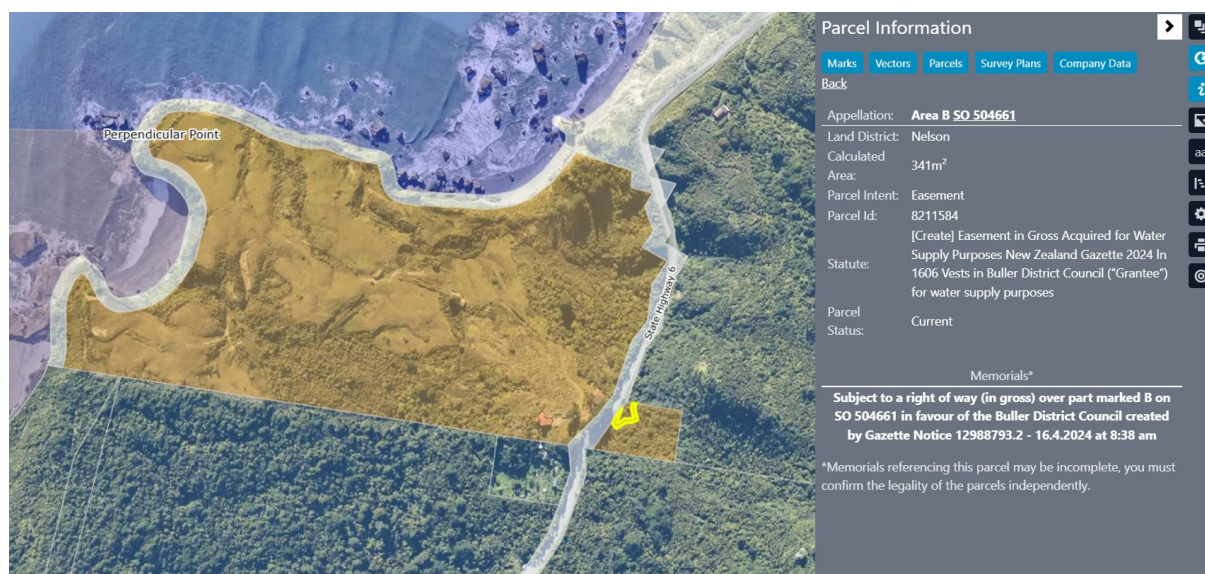


Figure 2: Water Access Easement, identified as Area B



4. *Provide the value of the development and undertake an assessment against Part 8 – Financial Contributions of the Buller District Plan (BDP).*

The revised AEE has included an assessment against Part 8 of the BDP, and whilst the development value remains uncertain at this point in time, it is estimated to involve an approximate value in the order of \$10M. In brief however, no specific financial contributions are considered necessary noting that the Applicant is providing all required roading and infrastructure development, and is providing extensive revegetation and landscaping outcomes across the site. Further, the site will remain in private ownership and management, does not involve subdivision, and is considered to provide a significant short and long term economic benefit to the region.

OTHER CONSENTS REQUIRED

1. *The application notes that proposed earthworks and wastewater discharge will require consent from West Coast Regional Council (WCRC), however the assessment provided is limited to Rule 79 of the West Coast Regional Water and Land Plan. Provide a full assessment of the proposal, including earthworks, discharges, land disturbance, works within and in the riparian margins of waterways, and works in proximity to wetlands (referred to in ecology report for Wetland W6), against the applicable WCRC plans and NES-FW to identify all consent requirements from WCRC. This is required so Council can determine whether section 91 of the RMA is applicable. (Note: it is acknowledged that further engineering design may be needed to assist in the assessment as discussed during the site visit).*

A full assessment against the relevant provisions has been provided in Section 5.4 of the revised AEE. In summary:

National Environmental Standard for Freshwater

The National Environmental Standard for Freshwater (**NES-FW**) sets requirements for carrying out certain activities that pose risks to freshwater and freshwater ecosystems. Section 5.4.1 of the revised AEE has considered the relevant Regulations under the NES-FW and considers that all proposed activities can be undertaken as permitted activities.

West Coast Regional Land and Water Plan

The West Coast Regional Land and Water Plan (**RLWP**) manages activities that may affect the lakes, rivers, groundwater, wetlands, geothermal water, and land including river and lake beds. Section 5.4.2 of the revised AEE has assessed the relevant rules of the RLWP and has concluded that the following activities will require resource consent from the West Coast Regional Council (**WCRC**):

- Earthworks outside of Erosion Prone Areas, earthworks within Erosion Prone Area One and earthworks within Erosion Prone Area Two as a **Discretionary Activity** under Rule 16.
- Vegetation clearance within Erosion Prone Area Two as a **Discretionary Activity** under Rule 16.

All other activities can be undertaken as a permitted activity under the RLWP, including the proposed wastewater discharge to land (based on a revised wastewater system as detailed in



the Earthworks, Water Supply, Wastewater and Stormwater Report' prepared by Stuart Challenger from Chris J Coll Surveying Limited.

West Coast Regional Air Quality Plan

The West Coast Regional Air Quality Plan (**RAQP**) covers Particulate Matter, odour, dust products of combustion, ozone, and the emission of greenhouse gases and was amended in 2024 to incorporate two new policies from the National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023. Section 5.4.3 and Table 8 of the revised AEE has assessed the relevant rules of the RAQP and has concluded that all proposed activities can be undertaken as a permitted activity.

West Coast Regional Coastal Plan

The West Coast Regional Coastal Plan (**RCP**) provides a framework for the management of the effects of resource use activities in the coastal marine area (**CMA**). The CMA is the area below the mean high water spring mark out to the 12 nautical mile limit at sea. As there are no proposed activities occurring in the CMA, the RCP is not relevant to this proposal.

Conclusion

As identified above and within the revised AEE, resource consent is required under the RLWP, for earthworks and vegetation clearance as Discretionary Activities. These resource consents will be sought in due course from the WCRC, with no other resource consents considered to be required. As outlined in Section 5.4 of the revised AEE, the application as lodged with BDC considers at length the issues associated with earthworks and vegetation clearance (both of which are relatively confined and minor in extent), with a full and clear understanding of the proposal outlined. To this end, it is considered that the application can proceed to notification and determination, with the relevant resource consents from WCRC advanced independently in due course.

ECOLOGY

- Page 18 of the ecology report details "Our preliminary assessment below indicates that the native vegetation units on the site could qualify as significant indigenous vegetation, which means that any development proposal should aim to minimise or avoid clearance of these vegetation types". In consultation with the ecologist, provide an additional plan(s) to clearly identify the proposed extent of land disturbance and buildings associated with the proposal, relative to all areas that do or could qualify as significant indigenous vegetation or significant habitats of indigenous fauna as per the WCRC Regional Policy Statement and BDP (including the location recorded for fernbird as referenced in the ecology report).*

As per our discussions, a high-level identification of significant indigenous habitat has been undertaken, by RMA Ecology, with two areas identified as potentially significant habitat to fernbirds (which were observed in the southern port of the site near Wetland 3), shown in **Figure 3**. The southern area includes three vegetation types, being wetlands, a buffer of grassland vegetation, and the adjoining regenerative native shrubs whereby fernbird was observed. The northern area has been included as probably fernbird habitat due to a similar community composition of the area, and the presence of mature coastal forest.



For the avoidance of doubt, and as per our discussions, these areas are indicative and are based on a professional judgement as to the extent of current fernbird habitat on the site, rather than on the basis of botanical features, and should not be considered as definitive mapping of significant vegetation which would require extensive additional work to be undertaken. In any event, it is noted that no works are proposed in these areas, and therefore there will be no adverse effects in relation to any significant vegetation / habitat areas.



Figure 3: Areas of potential significant indigenous vegetation identified by yellow outlines (RMA Ecology).

2. *The application seeks consent under Rule ECO-R7 of the Proposed Te Tai o Poutini Plan (TTPP) for indigenous vegetation clearance, however the location and extent of this is unclear. Page 30 of the ecology report details that “The proposed development will result in the clearance of open paddock vegetation, and exotic weedland and scrub. The two short lengths of walkway proposed to link parts of the northern and western areas of the site (see Figure 7 will be routed through mainly gorse areas, with a minimal amount of low regenerating native shrubland that will be removed estimated to be less than 50 m²”. In consultation with the ecologist, provide an additional plan(s) and details for the proposed location and extent of indigenous vegetation clearance that is sought under Rule ECO-R7.*

We note that non-compliance with Rule ECO-R7 was identified out of an abundance of caution, with the building locations and track alignments all intentionally identified to avoid the need for indigenous vegetation clearance as far as practicable. However, given the size of the site and areas of extensive gorse (and potential for indigenous vegetation within), it was recognised that there may be a need for some minimal indigenous vegetation clearance (which would be limited to the areas of access tracks and building platforms, and estimated to be less than 50m² in area). As noted above however, no vegetation clearance will occur in the significant mapped areas identified in **Figure 3**.

3. *Page 44 of the ecology report provides details on consent conditions that have been proposed by the applicant. Please provide further details/proposed wording for those consent conditions that have not been mentioned in the application document.*

The revised AEE has included updated to the proffered conditions (contained within Section 4.9) to ensure alignment with the recommendations outlined within the Ecology Report. These conditions include specific reference to the recommendations of the Ecology Report, and specifically the provision of an Ecological Enhancement Management Plan, vegetation clearance protocols, and a setback provision for vegetation clearance within 20m of locations recorded for Fernbird.

NATURAL HAZARD ASSESSMENT

1. *The Natural Hazard Desktop Assessment details “We recommend reviewing and, if necessary, updating your site layout in light of this assessment. Once the site layout is finalised, we can conduct a targeted site visit to refine the hazard areas further concerning the proposed buildings, infrastructure, and access roads/tracks within these areas”. As discussed during the site visit, it is understood that Tonkin and Taylor have subsequently completed a site visit, therefore provide an updated assessment/addendum from Tonkin and Taylor with respect to the risks from natural hazards on the proposed development.*

We can confirm that a T+T geologist visited the site on 28 August 2024, and confirmed the preliminary hazard areas identified to be suitable for assessing appropriate building locations at the site for master planning purposes. T&T have subsequently updated their Natural Hazard Assessment (Version 2, dated 24 March 2025) to record their site visit and views on the proposed development layout, with this replacing the previous assessment identified as **Attachment [F]**.

By way of brief summary, the revised Natural Hazard Assessment identifies that the buildings and access routes generally avoid the hazard areas where feasible, with three cabin locations overlapping with gully hazard areas, and one cabin located near to, and potentially within, the TTPP coastal setback boundary. These matters will need particular consideration prior to construction, with the Applicant agreeable to a condition of consent requiring further geotechnical reporting (i.e. confirmation of site location / hazard delineation or specific foundation design) prior to construction.

EARTHWORKS

1. *Page 29 of the application refers to minor earthworks associated with the development, however the transportation assessment details retaining structures required for access and there is limited information on the location and extent of cut and fill shown on the site works plan. Provide further details/plan(s) for proposed cut and fill earthworks clearly showing the locations of cut and fill, together with the existing and proposed finished ground contours.*

A revised Landscape Earthworks Plan (and associated earthwork summary / schedule) has been prepared, with this serving to replace the prior Earthworks Plan enclosed as **Attachment [O]**. The revised AEE incorporates this latest earthworks information, which by way of summary, will involve:



- 3365.5m³ of cut
- 2469.6m³ of fill
- 2.5m maximum cut depths (focused on the lodge)
- 2.5m maximum fill depths (focused on the site access upgrade).

The above earthwork estimates are preliminary in nature and subject to detailed design, however demonstrate the bulk of the earthwork activities are associated with the new access track formation and relatively minor in nature, with the most significant earthworks associated with the proposed site access upgrade and the lodge building. The accommodation cabins are prefabricated light weight structures, and are expected to have screw pile foundation designs that will avoid the need for any notable earthworks.

It is noted that the earthworks associated with the site access upgrade are subject to confirmation and agreement with NZTA, noting that the upgrade will involve the need for earthworks within the SH6 corridor.

2. *It is acknowledged that a Construction Management Plan is proposed as a condition of consent, however, please provide an engineering assessment (at least preliminary) of the proposed earthworks.*

An 'Earthworks, Water Supply, Wastewater and Stormwater Report' has been prepared by Stuart Challenger from Chris J Coll Surveying Limited, with this providing a preliminary engineering assessment of the proposed earthworks. This is enclosed with the RFI response, and referenced / appended within the revised AEE as **Attachment [N]**. By way of summary, based on the preliminary earthwork details, and with consideration in relation to matters of topography, ground cover, soil characteristics, rainfall intensity and duration, suitable erosion and sediment control measures can be established to suitably avoid and mitigate any actual or potential adverse effects. A preliminary Erosion and Sediment Control Plan has been provided for the works related to the site access upgrade (which represent the most significant earthworks area), however these matters can be refined as part of detailed design, and as per the proffered consent conditions outlined in Section 4.9 of the revised AEE.

SIGNAGE

1. *Consent is sought for a single advertising sign however no details of the proposed location or indicative design of the sign has been provided. Provide further details of the location, dimension and design of the sign to enable an assessment to be undertaken.*

The Applicant no longer proposes signage as part of this application, noting that at this point there remains high degrees of uncertainty around the specific location, design and content. To this end, any signage will be considered and advanced by way of a future resource consent application, which can be considered on its merits at that time. The revised AEE reflects the removal of signage from the proposal.

LIGHTING AND GLARE



1. *The application details that a detailed lighting plan has yet to be determined, and it is proposed to address lighting design outcomes via a management plan condition. It is considered that preliminary details of proposed lighting, including location, design, minimum/maximum parameters, etc, are at least required to assess the potential effects from lighting and glare, and an assessment of the proposed lighting. This is particularly important given the potential for adverse effects from artificial lighting on birds (especially penguins and Westland petrels) identified in the ecology report.*

Please find **enclosed** an Environmental Lighting Report prepared by 3D Lighting Design Limited, with this referenced / appended within the revised AEE as **Attachment [T]**. The Environmental Lighting Report has been prepared by a suitably qualified and experienced person, and provides a high level indication of the lighting outcomes / parameters that appropriately respond to the sensitivities of the site from a landscape and ecological perspective. In summary, the Environmental Lighting Report details the following outcomes

- Lighting along accessways to be defined into specific 'lighting zones';
- Low level and low output bollards;
- All lighting to be downward directed only;
- Adoption of warm colour temperate LED light sources.

The Environmental Lighting Report is intentionally high level in nature, but does demonstrate that suitable lighting outcomes can be achieved that provide way finding, whilst mitigating any potential adverse amenity and ecological effects. However, to provide some flexibility moving forward into detailed design, the Applicant proposes to finalise the lighting outcomes across the site through the previously proffered Exterior Lighting Management Plan consent condition.

2. *Provide additional details on the scope, content and requirements of the proposed Exterior Lighting Management Plan as the condition as currently worded, and in lieu of further supporting information, essentially defers the assessment of lighting effects. A draft management plan may also be useful.*

As identified above, whilst an Environmental Lighting Report has been provided, we have revised the previously proffered Exterior Lighting Management Plan within the revised AEE to ensure the condition incorporates appropriate details / responds to the recommendations of the Environmental Lighting Report. In this regard, the revised proffered condition includes further additional detail and specific matters that the Exterior Lighting Management Plan needs to identify, with this outlined in Section 4.9 of the revised AEE.

HAZARDOUS SUBSTANCES

1. *A 'gas bottle storage area' is referred to in the application and on the proposed plans. Provide an assessment of this aspect of the application against the hazardous substance rules in the BDP and include any consents as required.*

The revised AEE has considered the relevant rules for hazardous substances in the BDP, with resource consent required as a **Controlled Activity** under Rule 6.3.1 for the storage, usage, and loading of hazardous substances. Whilst the assessment is outlined within the revised AEE, we note that all gas bottles will be stored, including the central gas bottle store, in accordance with the requirements of the Hazardous Substances and New Organisms Act 1996



(HSNO Act). A management plan will be developed to ensure that they are stored and used safely with a spill response contingency plan implemented at all times.

LANDSCAPE, NATURAL CHARACTER, AND VISUAL EFFECTS

1. *As discussed during the site visit and in subsequent emails, Council has engaged Stephen Brown to undertake a peer review of the Landscape Assessment Report prepared by RMM. You will be provided with any feedback or questions as a result of this review in due course.*

Please find **enclosed** an Addendum to the Landscape Assessment Report, with this referenced / appended within the revised AEE as **Attachment [U]**. This Addendum responds to the landscape peer review by Stephen Brown, and is supported by an updated Landscape and Visual Graphic Attachment, with this referenced / appended within the revised AEE as **Attachment [R]**.

ELECTRICITY

1. *Provide details of proposed electricity supply to service the development and confirmation from the network utility provider that there is sufficient capacity in the network, or details of any upgrade(s) required.*

Please find **enclosed** a response from Aotea Electric confirming the power supply arrangements, with this referenced / appended within the revised AEE as **Attachment [V]**. By way of summary, Aotea Electric have investigated and confirmed that it is feasible to provide power supplies from the existing single-phase 11kV overhead line, with this able to be supplemented by photovoltaic (PV) solar systems (which is proposed for the accommodation cabins) and/or a back up generator.

WATER SUPPLY

1. *Council understands the applicant's intention, as described in item 4.4.1 of the application documentation, is to connect to the existing Council owned water main that at this point is an untreated supply, with additional water tanks on-site. Provide additional information on the treatment proposed for water supplied from the water main to the site and the expected volumes of water that will be taken/required from Council's supply for potable water and potential firefighting capability.*

An 'Earthworks, Water Supply, Wastewater and Stormwater Report' has been prepared by Stuart Challenger from Chris J Coll Surveying Limited, with this providing further information on the proposed water supply requirements, treatment outcomes, and fire fighting water supplies. This is enclosed with the RFI response, and referenced / appended within the revised AEE as **Attachment [N]**.

WASTEWATER

1. *The application proposes to install Biorock-S On-site Domestic Wastewater Treatment systems for this development. In item 4.4.3 of the application, the applicant refers to a feasibility assessment in regard to wastewater management on this site. In order for Council to assess*



this proposed system, please provide an engineering assessment of the proposed wastewater treatment and disposal, including suitability of the proposed systems for this site, any on-site test results to support the assessment, examples of where these systems have been used in New Zealand and the how these systems are performing, and any correspondence with WCRC to obtain their acceptance/approval of this system.

2. *Further to the above, the application states that the system will result in high quality effluent discharge. Please provide more information on how and where this was determined and how this will be achieved at this site.*
3. *The Certificate of Approval for Biorock expired in December 2021. Please provide more information on this expiry date or current certification.*

An 'Earthworks, Water Supply, Wastewater and Stormwater Report' has been prepared by Stuart Challenger from Chris J Coll Surveying Limited, with this providing further information on the proposed wastewater treatment outcomes. This is enclosed with the RFI response, and referenced / appended within the revised AEE as **Attachment [N]**. By way of summary, based on recent hand auger site investigations, a revised wastewater treatment and land application system is proposed, with this involving primary treatment through septic tanks, following by secondary treatment by an Advanced Enviro-Septic treatment system that is discharged to a land application bed suitable for the underlying soil types. This system has minimal maintenance characteristics, no mechanical parts, and ensures a high treatment quality, with several such systems installed in the region. Based on the information and assessment provided, this system, and disposal methodology, can ensure that all permitted activity requirements under the RLWP can be met.

Section 5.2.4 of the Earthworks, Water Supply, Wastewater and Stormwater Report outlines the effluent quality outcomes associated with the system, with this identifying a discharge quality of 3mg/L Total Suspended Solids, a Biological Oxygen Demand of 25kg/Ha/day, and a faecal coliform quality of 2,260 cfu/100ml at the point the wastewater is discharged to land. This has been assessed using the latest OSET – NTP trials and testing. This will be further reduced as the discharge infiltrates through the soil matrix under aerobic conditions.

As an alternative wastewater system is proposed from the original Biorock system identified within the AEE, no certification of that system is considered necessary.

STORMWATER

1. *Please provide a Stormwater Management Plan, prepared by a suitably qualified and experienced engineer, to demonstrate how stormwater from the proposed development will be managed to ensure that discharge from this development will be maintained at pre-development levels. This information should include, but is not limited to:*

- a. *Stormwater catchment and design calculations for 10% AEP and 1% AEP rainfall events, using the HIRDS – NIWA RCP8.5 scenario for rainfall intensity;*
- b. *Supporting calculations using TP108 methodology for the catchment areas profiles, including pre-development versus post-development for the site for 100yr ARI and dispersion pipe calculations;*
- c. *Results of soakage tests;*
- d. *Updated stormwater plans showing secondary flow paths/ overland flow paths with anticipated volumes;*
- e. *Tank details for stormwater attenuation within each Lot;*



- f. Hydrological assessment; and
- g. Easements and freeboard.

An 'Earthworks, Water Supply, Wastewater and Stormwater Report' has been prepared by Stuart Challenger from Chris J Coll Surveying Limited, with this providing further information on the proposed stormwater management outcomes. This is enclosed with the RFI response, and referenced / appended within the revised AEE as **Attachment [N]**.

By way of summary, it is not considered necessary to provide a full Stormwater Management Plan at this stage of the approval process, noting the proposed development is small in scale with the receiving stormwater ultimately flowing into the sea via onsite gullies. Further, all infrastructure will be private, and not vested in or under the control / management of BDC, and no subdivision is proposed. All stormwater discharges on the site will be controlled to ensure that there is no erosion or localised ponding of water. All roads and tracks established on the site will direct stormwater flows to adjacent swales which will discharge into the sea. All buildings will be managed to ensure stormwater is discharged into soak pits designed in accordance with NZBC E1/VM1 with overflows to an adjacent gully. As identified in the revised AEE, all stormwater discharges can be undertaken as a permitted activity under the relevant regional plans.

ACCESS, ROADING, AND PARKING

1. *In order for Council's Infrastructure department to assess the proposed internal roads, parking and manoeuvring areas for the development, please provide additional details and preliminary engineering design plans to demonstrate that the internal roads, parking and manoeuvring areas will comply with NZS4404:2010. These details/plan(s) should include consideration of the geotechnical constraints identified by Tonkin and Taylor, any on-site directional signage required, and existing and proposed culvert design/condition.*

We note that at this point, detailed engineering design has yet to be undertaken, however the proposal seeks to utilise the existing formed central access track(s) through the site, with earthworks proposed to ensure suitable design outcomes (in terms of gradients, formations, alignments etc) are achieved. With respect to the new access tracks, these will be similarly earth worked and formed to ensure suitable surfaces are achieved, with indicative roading / access formation details included in the Landscape Earthworks Plan enclosed. It is considered that any further detail can reasonably be determined as part of an engineering review and acceptance process with BDC (with associated consent conditions able to be imposed), with the application considered to provide suitable information and parameters in terms of access alignments, earthworks, and formation details.

2. *The application details the site works will occur in stages, however no specific details are provided on this. Additionally, no details are provided on construction traffic, either in the transportation assessment, application or proposed CMP condition. Provide an indicative construction timeline that details the staging of the project and length of each stage, and an assessment of the construction traffic that will be generated by the development and any measures proposed to manage this.*



The construction staging has yet to be determined, with this to be confirmed following certainty of the development outcome. However, it is noted that the accommodation cabins will be prefabricated off-site (in Timaru) and transported to site, with the predominant construction related activities focused on the infrastructure installation, site access upgrade, and lodge and worker accommodation buildings.

In terms of management of construction traffic, the Applicant acknowledges this will require close liaison (and approval) with NZTA as the relevant road controlling authority for SH6. In this respect, it is anticipated that NZTA will require detailed temporary traffic management during construction works, the details of which are best determined as part of detailed engineering design when the site access upgrade is confirmed. In any event, the proffered Construction Management Plan condition has been updated to include specific consideration of construction traffic management and staging of works.

3. *Page 46 of the application refers to an unsealed area by the lodge support building to provide 8 car parks (to meet the requirements of the BDP). Show where this is on a plan(s) and whether or not carparks are proposed to be formed/marked as available parking areas.*

We have identified on the revised Site Master Plan the designated overflow car parking area adjacent to the lodge support building (which will remain in grassed formation with no car parks demarcated, but given the area it is capable of accommodating a minimum of 8 parking spaces), however have also expanded the car park area (which now encompasses a total of 26 car parking spaces). This is detailed in the revised Site Master Plan identified as **Attachment [K]**, and within the revised Landscape and Visual Graphic Attachment identified as **Attachment [R]**.

WASTE MANAGEMENT

1. *Provide a Waste Management Plan for the site addressing solid waste management, including:*
- a. *What options have been considered for waste disposal and what is proposed;*
 - b. *Any proposals/plans for waste reduction; and*
 - c. *How will the waste (rubbish and recyclables) be sorted.*

At this point in time, the details around waste management and recycling for the development have yet to be determined. This level of detail is considered to be best determined at a later date when the operational management details are confirmed, however it is expected that all rubbish and recycling collection will be provided by a local commercial provider. The proposed lodge supporting building is anticipated to provide the central collection and pick up point, with suitable waste reduction and sorted measures able to be undertaken on site.

ADDITIONAL COMMENTS

1. *The site is located adjacent to Paparoa National Park. Provide evidence of/outcomes from any engagement with the Department of Conservation.*



The Applicant has approached the Department of Conservation on several occasions since October 2024, with this including an initial project briefing and invitation to discuss, a meeting request in November 2024, a further project briefing in mid March 2025 where the vegetation management outcomes were provided, and subsequently the circulation of the entire resource consent application in late March 2025. At this point, no specific feedback has been provided by the Department of Conservation, with the relevant correspondence enclosed.

- 2. The site will be accessed from State Highway 6 and the vehicle access is proposed to be upgraded. Provide evidence of/outcomes from any engagement with NZTA Waka Kotahi (noting that approval will be required from NZTA Waka Kotahi for the works).*

The Applicant approached NZTA in September 2024, with this including an initial project briefing and provision of the topographic survey plan / site access images, and follow up correspondence in October 2024 where the proposed site access design and the transport review was provided to NZTA. NZTA provided a response in November 2024 outlining their feedback. The relevant correspondence is enclosed.

- 3. There is a historic place noted on the site under the BDP and a SASM under the TTPP. Provide evidence of/outcomes from any engagement with Te Rūnanga o Ngāti Waewae and the NZ Historic Places Trust.*

The Applicant has sought to engage with Te Rūnanga o Ngāti Waewae at regular intervals from July 2024 through to February 2025. This has involved correspondence on the project, including the provision of draft site plans, and invitations to meet on site. At this point, no specific feedback has been provided, and no direct site meetings have been held.

The Applicant has approached Heritage New Zealand in March 2025 and provided information on the project, including the assessment that there are no issues of concern from a heritage / archaeological perspective. At this point, no specific feedback has been provided by Heritage New Zealand.

- 4. Whilst it does not affect the activity status of the application, the Council, in being consistent with previous consideration of applications, does not consider any component of the proposal (including visitor accommodation) to meet the definition of 'tourist related activity'.*

This position is noted, and whilst not materially impacting on the proposal, we remain of the view that based on the definition of 'tourist related activity'¹, and the nature of the activity proposed, that it is reasonably and accurately defined as a tourist related activity.

PUBLIC NOTIFICATION

As per our recent discussions, with a view towards advancing the resource consent application in an efficient manner, the Applicant requests public notification of the application in

¹ *Tourist related activity – any activity which primarily caters for, and provides a service to visitors to the District, and which relies on the natural and physical resources of the District as an attraction and integral part of the business activity.*



accordance with s95A(1), and the criteria set out in s95A(3)(a). To this end, we seek that BDC commence steps to publicly notify the resource consent application without delay. As per our discussions, we have revised the AEE to reflect the further information and updates provided as part of the RFI response, with this providing a complete application document suitable for notification.

We trust this information appropriately responds to the RFI, and provides a greater understanding of the proposal. Please contact me on daniel@townplanning.co.nz or 027 465 8099 should you have any queries.



Daniel Thorne
Director
Town Planning Group NZ Limited

ATTACHMENTS:

1. Revised AEE – R1
2. Gazette Notice 12988793.2 and SO 504661 (Attachment [B])
3. Revised Natural Hazard Assessment (Attachment [F])
4. Revised Landscape Earthworks Plan and Summary Schedule (Attachment [O])
5. Earthworks, Water Supply, Wastewater and Stormwater Report (Attachment [N])
6. Environmental Lighting Report (Attachment [T])
7. Addendum to the Landscape Assessment Report (Attachment [U])
8. Revised Landscape and Visual Graphic Attachment (Attachment [R])
9. Aotea Electric Confirmation of Power Supply (Attachment [V])
10. Revised Site Master Plan (Attachment [K])
11. Correspondence with Department of Conservation
12. Correspondence with NZTA
13. Correspondence with Te Rūnanga o Ngāti Waewae
14. Correspondence with Heritage New Zealand

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