



TOWNPLANNING GROUP

3 May 2026

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

As per our recent correspondence, following the close of submissions and receipt of Buller District Council's (**BDC**) letter dated 25 June 2025, in which further information was requested (**RFI**) on the above application, the Applicant has been engaging with submitters and progressing further expert information to respond to the concerns raised. In addition, it is noted that at the Applicant's request, a pre-hearing meeting was held with several submitters 10 September 2025, and decisions on the Te Tai o Poutini Plan (**TTPP**) were notified 10 October 2025. To this end, the purpose of this letter is to:

- provide an update on the project details in response to submitter feedback and the further expert investigations undertaken;
- respond to the various points raised in BDC's RFI; and
- provide an assessment of the application against the relevant provisions of the TTPP.

The letter is supported by additional reporting, plans and assessment, including a suite of volunteered consent conditions (with accompanying explanatory commentary), with these documents available at the following

SHAREPOINT LINK: [PUNAKAIKI WILD - RFI 2 RESPONSE AND SUPPORTING DOCUMENTS](#)

PROJECT UPDATE

As presented at the pre-hearing meeting, and in response to submissions, the Applicant has identified several changes to the proposal relating to the lodge design and the number of

accommodation cabins across the site. These changes are illustrated in the amended Site Master Plan, Vegetation Management Plan, Landscape Earthworks Plan, and Lodge Plans (**Attachment [A], [B], [C]** and **[D]** respectively), and summarised as follows:

- **Lodge design:** The scale of the lodge has been significantly reduced from approximately 620m² to 280m². The revised design now comprises two smaller building elements facing each other, while retaining the same general form and materiality.
- **Cabins:** The overall number of cabins has been reduced, with two family cabins (FC5 and FC6) removed from the south-western portion of the site, and one standard cabin (SC3) removed from the north-eastern portion.

In addition, through further engagement with submitters, including through the pre-hearing meeting and direct engagement with the Department of Conservation (**DOC**) and the NZ Transport Agency (**NZTA**), further detailed ecological investigations and transport / access design plans have been commissioned, together with the preparation of a number of volunteered consent conditions. By way of summary on these matters, we note:

- Following receipt of further transport advice and access design options (refer ECC Memo enclosed as **Attachment [E]**), NZTA have subsequently confirmed their acceptance of the proposed site access treatment, comprising a right-turn bay (refer ECC Design Plan enclosed as **Attachment [F]**). We note that engagement with NZTA is continuing, with a draft volunteered consent condition identified to give effect to the proposed access design, based on a template condition provided by NZTA. We understand that NZTA intend to provide a formal response confirming its position following receipt of the RFI response to BDC.
- Further detailed ecological site investigations were undertaken over five days in mid to late October 2025. These investigations involved the installation of a number of survey devices across the site, drone surveys of cliff habitat, and further detailed mapping of the vegetation communities across the site. The results of these investigations have been presented to DOC (refer updated Detailed Ecological Report enclosed as **Attachment [G]**), who have confirmed they are comfortable with the additional information provided in relation to lizard surveys and assessment, archaeological surveys and assessment, and bird surveys. DOC have requested a number of amended and specific conditions relating to lizards and birds, as outlined in the correspondence enclosed as **Attachment [H]**. We note that engagement with DOC is continuing, however the draft volunteered condition suite enclosed as **Attachment [I]** responds to those key matters raised by DOC.
- A number of matters were discussed with submitters at the pre-hearing meeting held 10 September 2025, with the Applicant committing to advancing a number of consent conditions to address specific items of concern. In this respect, the volunteered condition suite is enclosed as **Attachment [I]**, and for clarity, a summary response to the identified pre-hearing action items is enclosed as **Attachment [J]**.

For the avoidance of doubt, please treat the above changes and enclosed supporting documents as an addendum to the application.



FURTHER INFORMATION RESPONSE

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

POTABLE WATER SUPPLY

1. *Taking into account the feedback from Council's Infrastructure Department, provide additional details and calculations of the potable water requirements/supply for the proposal, including, but not necessarily limited to:*
 - i. *confirm the peak flow rate anticipated for the development to be sourced from Council's supply, and define "peak flow" of 18m³/d as in Council's opinion this relates more to a water demand of 18m³/d;*
 - ii. *total number, capacity and location of proposed water tanks for potable water supply, and how these will be fed; proposed location and extent of plant required for water treatment; and*
 - iii. *an updated rules assessment (if necessary), updated plan/s and additional comment from the landscape expert on the effects of any additional structures.*

As per correspondence and discussions with Vernie Ng and Sarie van der Walt from BDC, the detail of the potable water infrastructure remains subject to detailed design, with the Applicant committed to working with BDC, Taumata Arowai and Fire and Emergency New Zealand in relation to these works. In this respect, the Applicant considers that the matters raised by BDC can be appropriately addressed through a condition of consent requiring detailed engineering design of the potable water supply system prior to operation of the lodge and visitor accommodation. Notwithstanding this, with respect to the points identified above, we note the following:

- The reference in the application material to a "peak flow" of 18m³/day was intended to refer to the anticipated peak daily water demand for the development, rather than an instantaneous peak flow rate. The Applicant agrees to the installation of a flow restrictor on the inlet pipeline at the site boundary, adjustable between 1.5m³/hr and 2.5m³/hr, with a default setting of 2.0m³/hr. This would provide a maximum daily supply well in excess of the anticipated peak daily demand of 18m³/day.
- The detailed engineering design will confirm the total number, capacity, location and method of supply for the potable water tanks, together with the location and extent of any plant required for water treatment. However, sufficient potable water storage will be provided to meet operational demands, firefighting requirements, peak daily demand, and any relevant Building Code and drinking water standards, with the tanks anticipated to be fed from BDC's reticulated supply which traverses the property. The detailed design will also address the potential for degradation in raw water quality during weather events, including increased silt and sand at the intake, and confirm the measures proposed to manage this. Given the proposed food and beverage activities associated with the development, the potable water treatment system will be designed to meet or exceed all relevant drinking water quality standards.
- The Site Master Plan identifies a number of water tanks located in proximity to State Highway 6, with a proposed condition of consent ensuring the final location and design of these tanks is appropriately managed. In this respect, we note that any external water tanks or associated infrastructure will be finished in recessive colours and located and/or screened by landscaping, or partially buried, to minimise visual effects. On this



basis, it is not considered that the tanks or associated infrastructure will give rise to any additional landscape or visual effects beyond those already assessed.

Notwithstanding the above, it is noted that under the TTPP the proposed water tanks would be defined as minor structures, and considered under GRUZ-R5. While a permitted activity pathway exists, their location within 20m of State Highway 6 means they would fall to be assessed as a controlled activity under GRUZ-R15.

FIRE FIGHTING WATER SUPPLY

2. *The s92. response refers to having an option to have “clusters of three water tanks for fire fighting at five locations within the site”. Confirm whether this is being included as an option within the application, and if so, provide details on the total number, capacity and location of the tanks, an updated rules assessment (if necessary), updated plan/s and additional comment from the landscape expert on the effects of the additional structures.*

As per correspondence and discussions with Arlia O-Sullivan of Beca, and Fire and Emergency New Zealand District Manager Myles Taylor in response to BDC’s RFI, the reference to “clusters of three water tanks for fire-fighting at five locations within the site” was indicative only, and intended to demonstrate a potential servicing approach, rather than to confirm a fixed design solution. The final firefighting water supply solution, including the total number, capacity and precise location of any tanks, remains subject to detailed design and engagement with Fire and Emergency New Zealand, with this to occur through the building consent process. In this respect, and as per the discussions with Fire and Emergency New Zealand, the Applicant proposes to confirm these matters via a condition of consent requiring firefighting water supply to be provided in accordance with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice (SNZ PAS 4509:2008), or an alternative firefighting water source that is deemed acceptable by Fire and Emergency New Zealand (with such a condition incorporated into the volunteered condition suite).

As identified above, the Site Master Plan identifies a number of water tanks in proximity to State Highway 6. However, it is anticipated that the final location and design of firefighting tanks would be confirmed through the detailed design process as per the conditions included in the volunteered condition suite, and subject to the same GRUZ-R5 standard, and compliance status under the TTPP.

ECOLOGY

3. *Provide an updated/additional ecological assessment that:*
 - i. *includes the data from and results of surveying for the presence of birds and lizards at the project site undertaken within an appropriate season and survey period (noting the lizard survey should be undertaken by an expert herpetologist, using appropriate techniques and duration);*
 - ii. *assesses the effects of the activities involved in the proposal, including lighting and noise from construction activities and of the resulting development, on birds and lizards, including on threatened bird species with known habitat adjacent to the site (such as the breeding colony of kawau Tikitiki/spotted shag);*
 - iii. *identifies measures to avoid or mitigate those effects, including a draft lizard management plan if the results referred to in subparagraph (i) indicate the presence of lizards;*
 - iv. *provides comment on the recommendation from the Department of Conservation that lighting should follow the Australian Government National Light Pollution Guidelines for Wildlife (2023), including whether the proposed lighting will achieve this;*



- v. *provides comment on the measures outlined in the Environmental Lighting Report dated 29 April 2025, and whether those measures will be sufficient to ensure that adverse effects on avifauna from lighting, particularly on tāiko/Westland petrel, will be “negligible” as indicated in the Ecological Effects Assessment dated February 2025;*
- vi. *provides comment on the presence of the Punakaiki Marine Reserve adjacent to the site and any potential adverse effects on that reserve;*
- vii. *provides an opinion, and reasons, on whether a predator control programme is necessary for the site; and*
- viii. *provides an opinion, and reasons, on whether the following specific measures identified in the submission from the West Coast Penguin Trust are necessary (where those measures are not agreed to/volunteered by the applicant):*
 - Kororā (Little penguins)*
 - a. *Disturbance of penguin nesting sites should be avoided, especially during the breeding season June to January, and could be achieved by not providing access down to any beaches and not allowing dogs on the property.*
 - b. *It would be helpful if any records of penguins seen/found could be kept and shared with the Trust.*
 - Tāiko (Westland petrels)*
 - c. *Lighting for the site will need to comply with the National Light Pollution Guidelines for Wildlife, published by the Australian Department of Biodiversity, Conservation and Attractions.*
 - d. *Minimise light spill and reflection from all construction and operation activities, avoiding most sensitive times, i.e. dusk to dawn, mid-November to mid-January.*
 - e. *Seek solutions to minimise light spill from windows especially dusk to dawn, mid-November to mid-January.*
 - f. *Prepare and implement a plan for rescuing any downed petrels in conjunction with the Department of Conservation.*
 - Parekareka (Spotted (or blue) shag)*
 - g. *Establish regular monitoring of shags present and nesting on the cliffs, ideally monthly.*
 - h. *Drones may disturb nesting birds and their use should be avoided by guests and, if essential for management purposes, avoided wherever seabirds may fly or nest.*
 - Other coastal birds*
 - i. *Establish a record of all birds seen by staff and guests.*
 - j. *Provide predator control on the property to extend the efforts of the community predator control projects in the Punakaiki/Barrytown area.*

With respect to the above, and for brevity, please refer directly to the RMA Ecology RFI response enclosed as **Attachment [K]** which addresses the relevant RFI points above, along with the accompanying and updated Detailed Ecological Report enclosed as **Attachment [G]**. By way of summary, further ecological investigations have been undertaken to respond to the matters identified above, with a range of conditions volunteered to appropriately respond to the ecological concerns raised from submitters and DOC.

In addition to the matters noted above, please refer to the Lighting Memorandum prepared by 3D Lighting Design enclosed as **Attachment [L]**, which provides specific commentary on the mitigation strategies to address any actual or potential adverse effects associated with interior lighting of the cabins and lodge.

ACCESS AND TRAFFIC GENERATION

- 4. *Provide an updated/additional transportation assessment that:*
 - i. *As requested by NZTA, considers an amendment, in consultation with NZTA, to the design of the vehicle crossing to the application site so that it is consistent with the Diagram E standard of the NZTA Planning Policy Manual (PPM). Any new design should include/be accompanied by the following (or an explanation as to why the traffic engineer considers it is not necessary):*
 - a. *further assessment to determine the appropriate sightlines that should be achieved to ensure safe access to and from SH6. This should include a clear site plan showing*



- any areas of vegetation that would be removed and kept clear/maintained by the applicant (required via consent conditions) to ensure sightlines are maintained;*
- b. *amendments to the proposal as necessary to demonstrate that a level approach (platform of no more than 2%) for 10 metres from the driveway and vehicle crossing to the nearest white line of the carriageway is achieved;*
 - ii. *Provides comment and supporting information/evidence (as required) relating to the concerns raised by submitters about the accuracy of some information contained in sections 3 and 4 of the Transportation Assessment, including the existing operating speed environment being in the order of 70km/hr, the lack of recognition of pedestrians, cyclists, bus and other regular heavy traffic in the area, and the assumptions made regarding guest behaviour/traffic generation whilst staying at the site.*
 - iii. *Provides further clarification on the calculations in the Transportation Assessment relating to the type and volume of traffic that would be generated by the proposal. In particular, how the conclusion has been reached that there would be no more than 1 heavy or long vehicle movement per week with specific reference to the potential demand for vehicles and buses to service the accommodation, spa, restaurant, and to support functions held on the site.*

As identified earlier, further and ongoing engagement with NZTA has occurred, including the preparation of multiple access design outcomes, with NZTA confirming the proposed rural right turn bay (refer **Attachment [F]**) is acceptable. A condition of consent has been drafted to give effect to this access outcome, with detailed design to be undertaken in consultation with NZTA.

For completeness, please refer to the updated Transport Assessment enclosed as **Attachment [M]**, with this addressing the revised scope and access detail of the project, and the RFI matters noted above. In addition, an accompany transport letter has been prepared to provide a summary of the response to submitter concerns, with this enclosed as **Attachment [N]**.

5. *Further to the above, provide a geotechnical assessment of the potential slope stability and stormwater effects on SH6 associated with any upgrade of the vehicle crossing and removal of vegetation to increase sightlines along the property boundary with SH6.*

Please refer to the Tonkin + Taylor (**T+T**) geotechnical response enclosed as **Attachment [O]**, which provides further information on slope stability and stormwater effects on SH6 arising from the proposed site access works. By way of summary, the proposed right turn bay is anticipated to involve approximately 2-3m of road widening, and either an earth embankment or retaining wall on the downslope side of the road. The geotechnical response addresses the short and long term stability risks associated with these works, including the implications of vegetation clearance, and identifies appropriate measures to manage these risks.

Notwithstanding the above, it is noted that the proposed volunteered condition in relation to access, and the subsequent need for detailed design to be undertaken in consultation with NZTA, will ensure that any relevant slope stability and stormwater management outcomes associated with the site access will be appropriately considered and addressed (with these details required to be provided to BDC prior to construction).

HISTORIC HERITAGE

6. *Whilst it is acknowledged that an Accidental Discovery Protocol is proposed, given the concerns of HNZPT, provide an archaeological assessment prepared by a suitably qualified and experienced archaeologist, in consultation with Te Rūnanga o Ngāti Waewae, to assess the potential effects of the proposal on known and currently unknown archaeology. This assessment should include an assessment of effects which may directly affect the identified caves and their associated cultural*



values, including any effects from ground vibration and construction above/in the vicinity of the caves, and potential moisture pathways.

Please find enclosed as **Attachment [P]** an “Archaeological Assessment of the Proposed Punakaiki Wild Lodge and Cabins Development at Perpendicular Point, Te Miko, Punakaiki”, prepared by South Island Archaeology. The report assesses the archaeological values within the project footprint and provides recommendations for managing associated risks. In summary, no surface archaeological features were identified within the project area. The archaeological risk was assessed as low to moderate overall, with the greatest potential for subsurface material associated with terrace margins and hydrological features, with the project footprint largely avoiding natural gullies and drainage lines.

With respect to potential construction-related effects on the caves and their associated cultural values, these matters are considered to be most appropriately addressed through further detailed geotechnical assessment. This assessment can consider site-specific matters such as ground stability and drainage pathways, with a condition to this effect included within the volunteered conditions.

Te Rūnanga o Ngāti Waewae, through Poutini Environmental, have requested that their Accidental Discovery Protocol (**ADP**) be adopted as part of the conditions. This ADP has been included within the volunteered condition suite, with a copy of their ADP enclosed as **Attachment [Q]**. The Archaeological Assessment confirms that the ADP provides an appropriate and culturally responsive management framework to guide actions in the event of an accidental discovery. Notwithstanding the adoption of the ADP, the Applicant remains committed to ongoing engagement with Te Rūnanga o Ngāti Waewae.

NATURAL HAZARD RISKS AND EMERGENCY RESPONSE PLANNING

7. *Provide further comment from the engineering geologist on whether the proposed location of the cabins, particularly that within the TTPP coastal setback, are supported, and whether there will be any adverse effects from construction on the stability of the cliffs and identified sea caves.*
8. *Provide further specific analysis and details of how the “concept-level management measures and general geotechnical development advice” detailed on sheets 5, 6 and 7 of the Natural Hazard Assessment Version 2 will be addressed to ensure that the risk level is reduced to an acceptable level, or whether these measures are not necessary due to the proposed locations for development. Where, in the opinion of the engineering geologist, any unacceptable level of risk remains, provide details of/confirm the measures that will be undertaken to reduce the risk to an acceptable level, including via proposed/volunteered consent condition wording if relevant.*

Please refer to the T+T geotechnical response enclosed as **Attachment [O]**, which provides further detail on the proposed cabin locations, associated coastal and geotechnical hazard risks, and the measures to address those risks. In summary:

- The T+T assessment, which included a site inspection, is considered to provide a more refined delineation of coastal hazards than the regional-scale TTPP coastal overlay. On this basis, the proposed cabin locations within the TTPP coastal setback are supported from a geotechnical perspective, subject to appropriate design and mitigation measures. Notably, all cabins are located outside the cliff erosion and undermined cliff hazard areas identified by T+T, such that the layout is supported from a geotechnical coastal slope hazard perspective (both in terms of the building affected



cliff stability, and vice versa).

- The primary method of risk management has been through site layout, with development areas avoiding identified hazard areas where practicable. Where any elements of development interface with the T+T identified hazard areas, the concept-level recommendations within the Natural Hazard Assessment will be refined through site-specific geotechnical investigations and detailed engineering design, including earthworks, foundations, and drainage, with construction monitoring undertaken by a suitably qualified geotechnical professional. Overall, this approach is considered to reduce natural hazard risk to an acceptable level, with no residual unacceptable risks identified.

To ensure the above outcomes are achieved, proposed volunteered consent conditions require that all buildings are located outside the T+T identified cliff-related hazard areas (and falling debris hazard areas) and that all buildings, earthworks, and drainage infrastructure are designed and constructed so as not to materially increase natural hazard risk on the site or on adjacent properties. In addition, a condition is volunteered that requires the submission of a site-specific geotechnical assessment at the building consent stage, with this to confirm the suitability of each building location and any necessary mitigation measures, consistent with the recommendations of the T+T Natural Hazard Assessment.

9. *A number of submissions have raised concerns regarding the additional strain on local civil defence and emergency response services in the event of a significant earthquake. Please provide comment, as you consider relevant, on natural disaster and emergency response planning for the proposal.*

The Applicant acknowledges the importance of ensuring appropriate procedures are in place to manage emergency response following a significant natural hazard event, including earthquakes. While the physical design of the proposal has sought to avoid and mitigate natural hazard risk as far as practicable, it is recognised that operational response measures are also required. These will be developed as part of the site's standard operating procedures. To formalise this, an Advice Note has been included within the volunteered conditions, which provides for the preparation of an Emergency Management Response Plan. This plan will, as a minimum, address emergency access and evacuation procedures, power outages, water supply failure, communication protocols, staff training, and coordination with emergency services.

EFFECTS ON ADJOINING PROPERTY AT 4655 SH6

10. *Provide an updated assessment that specifically considers the effects of the proposal on the owners and occupiers of 4655 SH6, including the matters raised by Ms Hewlett.*

Please refer to the Addendum to the Landscape Assessment Report, enclosed as **Attachment [R]**, prepared by Nikki Smetham of Rough Milne Mitchell Landscape Architects (**RMM**). The addendum specifically addresses the potential effects of the proposal on the owners and occupiers of 4655 State Highway 6, including the matters raised by Ms Hewlett in her submission. In summary:

- the addendum confirms that any potential adverse visual effects on the adjoining



property will be low, and able to be appropriately avoided or mitigated. This conclusion reflects the existing viewing context, where views from the property are partially filtered by established vegetation, the separation distance of approximately 400m between the nearest proposed buildings and the dwelling, and the reduction in built form resulting from amendments to the proposal, including the removal of three cabins. The assessment also confirms that proposed building materials, recessive colours, and low reflectance finishes will limit visibility and glare.

- In relation to lighting effects, while it is acknowledged that the development will introduce additional lighting into the environment, the addendum concludes that proposed lighting design and management measures will appropriately control light spill and maintain the existing amenity values, including night-time character, to an acceptable degree.

In addition to the above, the Applicant has volunteered a suite of management plan conditions that provide further mechanisms to address matters raised by the adjoining landowner. These include a Vegetation and Pest Management Plan (requiring engagement with the adjoining owner in relation to pest control and restoration planting), along with Lighting Management Plan and Construction Management Plan conditions addressing lighting spill, construction traffic, noise, waste management, and complaints procedures. Collectively, these measures will ensure that potential effects on the adjoining property are appropriately managed during both the construction and operational phases of the development.

POTENTIAL FOR AIR TRAFFIC

11. Clarify whether helicopter landings and take-offs are anticipated as part of the operation of the proposed activities on the site, and if so, provide an assessment of compliance against any relevant plan rules, and an assessment of the effects of this aspect of the activity.

As identified in the volunteered condition suite, the Applicant has committed to prohibiting helicopter landings and take-offs as part of the proposed activities on the site. Accordingly, no helicopter use forms part of the application. On this basis, there is no requirement to assess the proposal against relevant plan rules relating to helipads or helicopter activity, and no adverse effects associated with helicopter operations will arise.

TE TAI O POUTINI PLAN

The decisions on the TTPP were publicly notified on 10 October 2025. While a number of appeals have been lodged, the rules in the TTPP have legal effect from the date of public notification, with those provisions not subject to appeal now operative and replacing the relevant parts of the Buller District Plan. As discussed in our recent correspondence on this matter, no additional resource consents are required under the TTPP, however, a full assessment of the relevant TTPP provisions is required.

Under the decisions version of the TTPP, the site is zoned **General Rural**, and subject to the following relevant overlays, as identified in **Figure 1**:

- Coastal Environment;



- Outstanding Coastal Natural Character (NCA42 - Dolomite Point Pancake Rocks and NCA44 - Woodpecker Bay foothills to Needle Point) (Schedule Eight);
- High Coastal Natural Character (NCA43 – Te Miko) (Schedule Seven)
- Outstanding Natural Landscapes (ONL45 - Ōkoriko/Razorback, Dolomite, and Perpendicular Point) (Schedule Five);
- Site of Significance to Māori 30 (SASM30, Te Miko, Ara tāwhito);
- Coastal Inundation 2 Hazard Overlay;
- State Highway Road Noise Overlay.



Figure 1 TTPP Planning Maps GIS

We note the above relevant overlays are generally consistent with those already identified and assessed within the application.

Whilst noting a resource consent authorises an activity and not a breach of rules, and several rules remain subject to change through resolution of appeals, the following provides a summary of the relevant TTPP provisions for which a non-compliance has been identified, with a full assessment enclosed as **Attachment [S]**.

- **TRN-R1** – the proposed vehicle crossing does not comply with the required sight distance, separation and design requirements identified in Tables 1, 3 and 4 - **Restricted Discretionary (TRN-R18)**
- **NH-R30** – the proposal includes buildings containing hazard sensitive activities in the Coastal Hazard Inundation Overlay (limited to the edge of the lodge, and a single cabin, with a natural hazard risk assessment provided with the application) - **Restricted Discretionary (NH-R30)**



- **CE-R5 and CE-R7** – the proposal involves buildings (limited to two cabins (FC3 and FC4, and a portion of FC2) and earthworks within the High Coastal Natural Character Overlay – **Restricted Discretionary (CE-R15)**
- **CE-R10, CE-R11, CE-R16, CE-R18 and CE-R19** – the proposal involves buildings and earthworks within the Outstanding Coastal Environment Area that do not meet the permitted activity standards – **Non-Complying (CE-R22)**
- **EW-R1, EW-R2, and EW-R3** – the proposal involves earthworks that exceed the maximum cut and fill depths – **Restricted Discretionary (EW-R7)**
- **LIGHT-R5** – artificial outdoor lighting in the Outstanding Coastal Natural Character Overlay (applies to only a portion of the site, impacting four cabins, for which there may be controlled / managed lighting between 10pm-7am (will be subject to a Light Management Plan)) – **Discretionary (LIGHT-R7)**
- **GRUZ-R1** – the proposal includes buildings that are located within 5m from internal boundaries and 10m from road boundaries (noting the presence of a legal paper road) that are serviced by a vehicle crossing that does not meet TRN-R1 – **Discretionary (GRUZ-R32)**
- **GRUZ-R3** – the proposal includes residential activity that is serviced by a vehicle crossing that does not meet TRN-R1, with a condition providing an alternative fire fighting water supply arrangement that may not accord with the New Zealand Fire Service Firefighting Water Supplies Code of Practice – **Discretionary (GRUZ-R31)**
- **GRUZ-R5** – the proposal includes minor structures that are located within 20m of the State Highway Boundary – **Controlled (GRUZ-R15)**
- **GRUZ-R20** – the proposal includes the provision of visitor accommodation activity that does not comply with the specified standards – **Discretionary (GRUZ-R30)**
- **GRUZ-R29** – the proposal includes the provision of commercial activity that exceeds 250m² in floor area – **Non-Complying (GRUZ-R33)**

As identified above, the activity status of the proposal remains **non-complying**, notwithstanding section 88A of the RMA, with the nature and extent of non-compliances generally consistent with those matters already identified and assessed in the original application.

In summary, the expert assessments prepared in support of the application provide a comprehensive evaluation of landscape, transport, natural hazard and ecological effects, supported by an archaeological assessment. Any TTPP provisions that have subsequently gained legal effect and are not met by the proposal do not give rise to new or materially different issues beyond those already considered through the application and subsequent RFI responses.

Overall, having regard to the original application and updated technical assessments, the proposal is considered to be generally consistent with the relevant objectives and policies of the TTPP, and is not contrary to the broader intent and direction of those provisions.



NEXT STEPS / ACTIONS

The Applicant has sought to constructively address the matters raised in submissions and Council’s RFI, and considers that the enclosed material provides an appropriate and comprehensive response. On this basis, the Applicant is keen to progress the application to hearing at the earliest practicable opportunity. We understand that BDC will circulate the updated information to submitters, and the Applicant remains open to further dialogue and engagement, where appropriate, to assist in achieving an efficient and focused hearing process, as/if required.

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

SUPPORTING ATTACHMENTS:	
SHAREPOINT LINK:	PUNAKAIKI WILD - RFI 2 RESPONSE AND SUPPORTING DOCUMENTS
[A]	Amended Site Master Plan
[B]	Amended Vegetation Management Plan
[C]	Amended Landscape Earthworks Plan
[D]	Amended Lodge Design Plans
[E]	ECC Access Options Design Memo
[F]	ECC Right Turn Bay Design Plan
[G]	RMA Ecology Updated Detailed Ecological Report
[H]	DOC Correspondence
[I]	Volunteered Conditions of Consent
[J]	Pre-Hearing Meeting Actions – Applicant Response Summary
[K]	RMA Ecology RFI Summary Response
[L]	3D Lighting Design – Interior Lighting Memo
[M]	Carriageway Consulting Updated Transport Assessment
[N]	Carriageway Consulting RFI Summary Response
[O]	Tonkin + Taylor RFI Geotechnical Response



[P]	South Island Archaeology Archaeological Assessment
[Q]	Te Rūnanga o Ngāti Waewae Accidental Discovery Protocol
[R]	Rough Milne Mitchell Landscape Architects – Landscape Addendum
[S]	Te Tai o Poutini Plan – Rule Assessment

