

APPENDIX SIX

ISSUES RAISED IN SUBMISSIONS

RC240079 – ACG Properties Limited – Issues Raised in Submissions

Submitter Name	Address/Property	Support/Oppose	Issues Raised	Requests / recommendations	Wishes to be heard
1. Andrzej Suchanski	Address for service: CMB Box 57, Punakaiki, RD1, Runanga 7873	Oppose (in current form)	1. Lacks documentation a. No final results of consultation with local Iwi, DoC (also refer to item 4.2), Fire Services (also refer to item 4.3) and Transit NZ (also refer to item 4.1.1) 2. Unclear what relationship is with applicant and Lindis Group Other concerns: 3. Traffic and Access - SH6 access to property: a. The application is based on some unsupported and/or untrue statements such as the traffic along SH6 in this area is rather low. Obviously no observations of the traffic congestion especially during summer seasons are included in the application nor any inclusion of heavy vehicles in the traffic intensity consideration. Also the applicant deliberately downplays traffic count generated by the development eg stating that the guests wont be leaving their accommodation!!! But to explore is the point of visiting such interesting a place with amazing places to see. Does ACG think the guests will be watching TV during their stays? b. Also the traffic count due to the movement of permanent and off-site staff, servicing and goods delivery vehicles is evidently neglected or suitably downplayed. c. The development will also generate a large pedestrian and possibly bicycle traffic along SH6 where there is no provision for a footpath nor bicycle path. d. There is no detailed engineering plan/design of the access to SH6 which was based on the factual traffic data for current and projected traffic intensities. 4. Vegetation regeneration/landscaping plan - The regeneration of vegetation to its original native coastal bush: this is not very detailed and rather vague in the application and based on unsupported statements. This needs to be supported by a very detailed landscaping plan with timelines, and approved by DoC. 5. Water supply - the proposal will generate rather a large demand for potable water. The applicant as in the supporting report by C Call Surveyors, wants to tap to the existing Punakaiki Water supply which runs from a private property further up north and adjacent to the hill side of SH6. Buller District Council (BDC) who manages and maintains the water supply system for the Punakaiki Township could not secure the source yet, and the negotiations with the owners of the land where the water is coming from have not been resolved. The water supply suffers from prolonged disruptions during which it relies on a modest storage near the water treatment plant and often the residents are asked by BDC to limit their water usage, especially during long periods of dry weather. The connection of the proposed development to the water pipe will “steal” water from the Punakaiki Township and no doubt make the situation worse. There is nothing in the proposal as to what steps will be taken to alleviate this very certain situation. 6. Potential for air traffic - Though not touched on in the application many if not all residents of the area including myself fear the applicant will introduce some form of air traffic (helicopters and/or planes) to and from the site. This can not be over emphasised the residents of this area do not want any aircraft facilities in the area now and in the future. 7. Effects on neighbouring property of Carolyn Hewlett - There is no consideration in the application of the impact the development will have on the next door neighbours eg Carolyn Hewlett who’s property is adjacent to the land for the proposed development. What does the applicant propose to mitigate the impact from the development on the adjacent neighbours? 8. Natural disaster planning - The development will add a large number of people (guests and personnel) at any time to the population of the Punakaiki area. There is no clear explanation what the submitter	1. The application should be declined until all the information and clarifications are provided and further public consultation carried out. 2. A firm confirmation/statement from the applicant as to their plans with the regard to any air traffic to and from the site.	Yes, but unconfirmed hearing attendance

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			will provide as emergency/contingency means in case of the Alpine Fault rupture (AF8) or in the event of any other natural disasters. The population increase from the development will create a considerable demand/load on the Local Civil Defence organisation if there is no sufficient provision for natural disaster contingencies by the development.		
2. Carolyn E Hewlett	Address for service: CMB 14, Punakaiki, RD1, Runanga 7873 Owner/occupier of Pt Section 13 Blk IX Brighton SD (NL87/135) – immediately to the south of the site	Oppose	1. Property at Pt Section 13 Blk IX Brighton SD will be seriously impacted 2. Access, traffic generation and speed - Traffic assessment concerns – vehicles sound like they are travelling faster than 70kph, increased traffic increases likelihood of accidents. - Potential for confusion between vehicle access locations of Hewlett property and the site, insufficient visibility/sightlines at access, will vehicle access formation destabilise the slope - Has morning and evening weekday ‘rush hour(s)’ been considered, has large number of truck and trailer units utilising the road been considered, road safety concerns - Additional traffic noise when vehicles are accelerating and slowing at vehicle access. 3. Geotechnical risks and natural hazards - Concerns about geotechnical stability on the site – there are Karst layers beneath the proposed locations of main building and some cabins on north facing edge of site, and there could be collapsed Karst underneath, unknown geotechnical risks. Also unknown holes, grikes, cracks and large limestone rocks, potential for collapsing limestone, risks from an earthquake event. Are 3 of the cabins located above the cave below? 4. Appropriateness of the activity (including public bar) in the Paparoa Character Area and High and Outstanding Natural Character Area - Whilst applicant has good intentions, is this proposal appropriate for this site given the zoning? Site will lose its naturalness, it is “de-wilding Punakaiki” 5. Visual effects and viewpoints - 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 - Reflection from rooves and windows will have a visual effect - 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. “Dark sky” experience will be significantly negatively impacted by building lights, vehicle lights, way-finding lights etc 6. Alignment with relevant policy documents - Application states proposal is an “eco-tourism offering” when assessing against Section 4 of WCRC RPS, but is this defined, is the proposal really eco-tourism? - Application states proposal “represents a sustainable use” when assessing against Section 4 of WCRC RPS, but how is it sustainable with so much material being brought onto the site and taken off? - Application states proposal “seeks to establish an eco-tourism offering that seeks to stimulate the social, economic, and cultural wellbeing of both tourists and the local community” when assessing against Policy 10 of NPS-IB, but what are the social, economic and cultural outcomes being offered/sought?	1. Decline consent as presented, applicant should re-design to be eco and sustainable	Yes, confirmed hearing attendance

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3. Development West Coast, c/- Fiona Hill, Economic Development Manager	Address for service: PO Box 451, Greymouth	Support (conditional)	1. Development presents a significant opportunity to strengthen and diversify our visitor economy. Accommodation of this calibre will: - Enhance visibility of our region as a destination of choice, amplifying awareness of the unique experiences on offer on the West Coast. - Demonstrate that the West Coast is a viable and attractive place for private investment, with strong potential for return. - Contribute to population growth by attracting people who may choose to live and work here because of their visit. - Fill a well-acknowledged gap in the market by catering to the high-end visitor segment, which is currently underserved in the region. As the Regional Tourism Organisation, we regularly receive feedback from inbound tourism operators and travel trade representatives that the lack of luxury accommodation is a key barrier to promoting and including the West Coast in premium travel itineraries. This development directly addresses that gap and supports broader tourism and economic goals. Development of luxury lodge accommodation of this size directly supports the objectives of the New Zealand-Aotearoa Government Tourism Strategy, which aims to grow tourism's contribution to the economy through high-value visitation.	Support activity conditional on all relevant affected parties, including iwi and DOC having been appropriately consulted and environmental considerations fully addressed.	No
4. Director-General of Conservation c/- Suvi van Smit, Operations Manager, Buller District, Western South Island Region (acting under delegated authority)	Address for service: c/- Jane Macleod, Senior RM Planner, DOC, P O Box 5244, Dunedin 9054	Oppose (in current form)	1. Insufficient information provided to identify and address potential adverse effects, or how the proposal will avoid, remedy or mitigate effects on indigenous birds, including spotted shags, great-spotted kiwi, sooty shearwater, Westland petrel, little penguin, fernbird, long tailed cuckoo, South Island robin and New Zealand falcon. - Site-specific bird survey as recommended in the 2023 RMA Ecology desktop study should be undertaken prior to any hearing. - I understand that there is a breeding colony of kawau tikitiki/spotted shag (<i>Stictocorbo punctatus</i>, Threatened – Nationally Vulnerable) on the cliff shelves on the northern cliff directly below the site (around 20m from the site boundary, and 20m down the cliff face). Plans provided with the application indicate that the main lodge building and six of the cabins are proposed directly adjacent to the northern cliff. The breeding colony is the largest spotted shag colony on the West Coast (c. 600 pairs). It is a national stronghold population and a designated an Important Bird Area by Birdlife International, with the presence of at least 1% of the global population of this species. - In addition, tītī/sooty shearwater (<i>Puffinus griseus</i>, At risk – Declining) burrows may be present on the site, and it is likely that roroa/great spotted kiwi (<i>Apteryx haastii</i>, Threatened –Nationally Vulnerable) are present on the site, which is bordered to the south by the Paparoa National Park. - Spotted shags, sooty shearwater and great-spotted kiwi are not discussed in any detail the application (either the desktop study or the fuller ecological effects assessment), and so effects on these species are not specifically assessed or managed. I consider that these are significant omissions. - Other bird species that are or may be present on the site are mātātā/fernbird (<i>Poodytes punctatus</i>, At risk – Declining), koekoeā/long tailed cuckoo (<i>Urodynamis taitensis</i>, Threatened - Nationally Vulnerable), kakaruai/South Island robin (<i>Petroica australis</i>, At Risk – Declining), and karearea/New Zealand bush falcon (<i>Falco novaeseelandiae</i>, Threatened – Nationally Increasing). - The AEE acknowledges potential adverse effects on tāiko/Westland petrel (<i>Procellaria westlandica</i> Falla, At Risk – Naturally Uncommon) and kororā/little penguins (<i>Eudyptula minor</i>, At Risk – Declining) from lighting associated with the development, and a lighting plan is proposed to minimise artificial light spill and the risk of the development having adverse effects on fledging	- Prior to any hearing, surveys of bird and lizard life that may be affected by the proposed activity and an archaeological assessment of the site must be undertaken by the Applicant, in order to inform the assessment of effects and approaches to avoid, minimise, remedy, offset or compensate for adverse effects; and - If the consent authority is minded to grant the application, that it imposes appropriate and enforceable conditions to manage effects on indigenous biodiversity, historic and cultural heritage, and natural coastal character and landscape values. - I also seek such alternative and/or additional relief as may be necessary and appropriate to address my concerns.	Yes, confirmed hearing attendance

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			petrels. I consider that spotted shags may also be adversely affected by lighting. I am particularly concerned about the effects from lighting on tāiko/Westland petrel, given the risk of fledglings grounding themselves and then dying; this species only have one mainland breeding colony, close to the site. g. I note that the AEE includes an Environmental Lighting Report prepared by 3D Lighting Design Ltd, which discusses potential adverse effects from lighting, including on birdlife, and recommends that an External Lighting Management Plan be required as a condition of consent. If consent is granted, any such plan should, as a minimum, ensure that lighting follows the Australian Government National Light Pollution Guidelines for Wildlife (2023) to ensure the adverse effects of artificial lighting on tāiko/Westland Petrel are avoided. I am also concerned that there are other potential adverse effects on threatened and at-risk birdlife from increased human activity on the site (aside from lighting), including from construction and operational noise, and from any pets that may be brought to the site. 2. Insufficient information provided to identify and address potential adverse effects, or how the proposal will avoid, remedy or mitigate effects on lizards, including speckled skink, forest gecko and West Coast green gecko. a. Advice from DOC staff indicates that there may be a small population of speckled skink around Punakaiki township. This species is the newly identified Oligosoma aff. Infrapunctatum Hoki/Foulwind, which occupies open habitat including grasslands and/or coastal areas. As the species was only recognised in the last month, it does not yet have a classification in the NZ Threat Classification System (NZTCS); it will be given a preliminary rank in August this year. In addition, forest gecko Mokopirirakau granulatus (At risk – Declining) and West Coast green gecko Naultinus tuberculatus (Threatened – Nationally Vulnerable) could also be present in forested areas. b. I consider that a comprehensive site survey is required, to fully understand lizard presence at the site. This survey should be undertaken by an expert herpetologist, using appropriate techniques and duration, based on the types of habitat that are affected. c. Presence, or likely presence, of lizards, based on the herpetologist’s expert view, would then inform what lizard management is needed (if any), and whether approvals are required under the Wildlife Act. If management is needed, the details should be outlined in a Lizard Management Plan that could be used as a basis for both resource consent and Wildlife Act authority applications. 3. Insufficient information provided to identify and address potential adverse effects, or how the proposal will avoid, remedy or mitigate effects on an area of significant vegetation or habitat of indigenous fauna (assessed against criteria in Appendix 1 of the West Coast RPS). a. As indicated in the discussion of birdlife and lizards above, I consider that there may be further at-risk and threatened bird and lizard species present at or in the immediate vicinity of the site, which have not yet been identified by the Applicant. If these species are present, this will be relevant to an assessment of the site’s ecological significance. Therefore, the surveys requested in the sections above are necessary to fully assess and manage potential effects from the proposed activity on areas of significant indigenous vegetation and significant habitat of indigenous fauna. b. Although the proposal does not involve the clearance of large areas of vegetation, effects from increased human activity, noise, lighting and pets may still result in adverse effects on significant ecological values at the site. 4. Insufficient information provided to identify and address potential adverse effects, or how the proposal will avoid, remedy or mitigate effects on historic and cultural heritage in the coastal environment, including a site of significance to Māori covering most of the site of the proposed		

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			activity, identified in the proposed Te Tai o Poutini District Plan, and an NZAA site close to the proposed activity, identified in the operative Buller District Plan. a. The presence of the SASM highlights the fact that further archaeological sites may exist within the site, in addition to the sea caves to the west. However, no archaeological assessment is provided with the application. Therefore, I consider that the AEE does not adequately identify potential effects on historic and cultural heritage values in the coastal environment. b. To inform the Council's consideration of the consent application, the applicant should undertake an archaeological assessment of the whole site, taking into account both the Site of Significance to Māori and the NZAA site. I note that the SASM overlies the bulk of the site. 5. Concerned that the proposal will have adverse effects on the natural character and landscape values of the site. 6. Overall, as currently configured, I consider that the application is contrary to the identified provisions of the Operative Buller District Plan, Proposed Te Tai o Poutini Plan, WCRC RPS, NPS-IB, NZCPS and RMA.		
5. Heritage New Zealand Pouhere Taonga c/- Arlene Baird, Area Manager Canterbury/West Coast	Address for service: c/- Mitzie Bisnar, Planner Canterbury/West Coast, PO Box 4403, Christchurch 8140	Does not oppose subject to recommendations being taken into account. Submission relates to works within proximity of a recorded arch site and within a SASM overlay.	1. Given the close proximity of the subject site to an identified archaeological site, there is high potential for the archaeology to continue or for there to be further archaeology within the project area. The project has not considered the potential impacts to unknown archaeology.	1. HNZPT strongly recommends that an archaeological assessment is undertaken by a consultant archaeologist prior to works being undertaken, to clarify the potential impacts to archaeology (both known and unknown currently), including an assessment of effects which may directly affect the caves and their associated cultural values. HNZPT recommends assessing potential and actual effects directly relating to the cave and ensuring any effects associated with the works, such as ground vibration and potential moisture pathways, will not adversely affect the integrity or values of the caves.	No
6. Lee Harris	17 Kaipakati Point Rd, Pahautane, 7871	Oppose (in current form)	1. Application is incomplete/contains insufficient information: a. Outstanding approvals from Ngāti Waewae, Waka Kotahi [NZTA, for site access], the NZ Fire Service, or DOC b. Consent cannot be granted without designs for Stormwater management, lighting, earthworks, specific foundation designs, topography, an engineering solution to access gradient, dust management, a CMP to manage “dirty water”, and geotechnical mapping of hazard areas. c. Uncertainty about helicopter usage on the site, could have adverse effects on neighbouring Scenically Sensitive Residential area; the biodiversity of the site and its surrounds; and the fledgling Dark Sky Project. d. Need to know emergency planning intentions in the event of an AF8 earthquake e. What are the mitigation measures for effects, including lighting, noise, amenity, on the adjoining property of Carolyn Hewlett and Will Smith		Yes, but cannot attend the hearing

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			2. Application contains unsupported assumptions and factual errors: a. "... the proposal will facilitate land to be used ... in meeting the needs of the community" [p129]. This is excellent news as the local group working towards getting a Punakaiki Community Facility have been looking for a suitable location for some time. We will be in touch. b. In order to comply with BDC Paparoa Character Area Rule 6.3 [p45] there needs to be a plan or design for bunding the hazardous substance storage. 3. Transport Assessment, Access and Traffic Generation a. Transport Report - "... speeds will be lower than 100kph" p85 and "... the volume of vehicles on the road are [sic] modest" p85. The Transport Report repeats this low speed [p3], also without support. Locals familiar with the roads are known to whiz through these 100kph bends at top speed, although the more prudent would be mindful of the large numbers of ponderous tourist traffic, including large campervans and buses, in the peak of the visitor season. b. "the highway ... is not used by heavy vehicles" p85. Perhaps the applicant is unaware of the daily transit of numerous milk tankers (up to five at a time in close succession); freight trucks including truck and trailer units; tourist buses; large camper vans and the odd house being shifted to a new location. As these vehicles are passing in front of our property some 8km north, it's more than likely they will be passing the applicant's driveway. c. While the applicant's access might well be off a State Highway, it's a state highway with no cycle trails or walkways linking the area from Charleston to Punakaiki, and south to Greymouth. Locals and tourists cycle and walk these areas regularly, particularly in the summer. It would be good to see some sort of system to warn walkers, cyclists and passing vehicles if a vehicle was about to emerge on to the State Highway. At the very least, it would be useful to warn visitors about the known times of day when processions of milk tankers are likely to be roaring up or down the road. d. "The access is to remain in the same location ... therefore will have no additional effects on the amenity and safety of neighbouring properties" [p86], except in my 11 years living on the Coast I've never encountered one vehicle entering or exiting this driveway, let alone dozens a day. The new development will have different effects on all of us using the State Highway several times a week. e. "remote place ... their extent of trip-making will be reduced" [p7]. As the operator of a small accommodation unit in a remote place, with magnificent Coastal views to Aoraki Mount Cook, our experience and those of most of the bespoke visitor accommodation locally has been that we spend some time talking about the various trails, tracks and local activities and experiences people might be interested in. This location will be a very different experience for the applicant's guests from their very remote Lindis Pass facility. f. Individual homeowners up and down the Coast Road have had to go through hoops, and sometimes have been refused, State Highway access because of visibility. Short of removing truckloads of roadside native bush (much of which is surely not on the applicant's land), and re-engineering some of the curves in the road, it's hard to see how this accessway would be a shoe in ("not expected that there are any reasons why sight distances that are appropriate for the prevailing operating speed [100kph] of the highway could not be achieved"). g. It will require a lot of thought/work, including the mitigation for the initial steeper section of the access. Locals might not be experts, but we have a lot of experience with steep driveways, pitfalls, rescuing tourists who regularly get stuck. Just ask... plus of course show us your intentions. h. While we might not have traditional "public transport", there are daily buses both ways run by the East West Shuttle and Intercity. Not to mention the numerous seasonal tourist buses.		

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			4. Lighting a. We need specific details about lighting. Having spent many months working through improving resource consent conditions for a new mining operator south of Punakaiki, we are aware of the impact lighting can have on our local wildlife heroes, the Westland petrel, whose mainland nesting site is just south of Punakaiki. b. As part of the Westland Petrel Patrol, we know of grounded petrels being found on the State Highway just to the north of the applicant's access way. Plus there are other bird colonies adjacent. Site lighting must be minimised and avoid light spill. This needs to be spelled out. 5. Water Supply a. The applicant expects to use the vulnerable Punakaiki water supply, and is perhaps unaware of ongoing sabotage events resulting in frequent boil water notices. That, and the need to have emergency water supplies in the event of a major earthquake event, mean it would be prudent to rethink or at least come up with on-site mitigation measures. 6. Benefits to local or regional economy a. New employment opportunities, and flow on effects to suppliers and local businesses are to be applauded. Just a caution to the applicant not to amplify numbers unnecessarily as locals have heard this sort of thing before and have come to view such hyperbole with cynicism and distrust.		
7. New Zealand Transport Agency Waka Kotahi	Address for service: c/- Charlotte Niederer, NZ Transport Agency Waka Kotahi Christchurch, Level 1, BNZ Centre, 120 Hereford Street, PO Box 1479, Christchurch 8022	Oppose	1. NZTA oppose application unless the applicant provides more information to be able to assess the impacts on the state highway network and infrastructure. NZTA also considers that appropriate state highway vehicle crossing design and formation is required. 2. Access design: a. The applicant proposes a Diagram D vehicle crossing standard, however NZTA can confirm that the advice provided to the applicant has been that the vehicle crossing needs to be formed to the New Zealand Planning Policy Manual 2007 (PPM), Appendix 5B (Accessway standards and guidelines), Diagram E vehicle crossing standard and NZTA's position on this has not changed. b. The ITA concludes that the PPM's Diagram D vehicle crossing standard would be sufficient for the anticipated vehicle generation. However, given the location of the vehicle crossing, potential sightline constraints, road geometry, and the type and volume of traffic that would use the vehicle crossing NZTA considers that the access should be designed to the NZTA's Diagram E standard as outlined in the PPM. c. When considering the design standard appropriate for the proposal, it is important to note that the PPM is a guidance document and as acknowledged throughout the document the specific design standard to which a vehicle crossing/access should be formed needs to be considered on a case-by-case basis. 3. Type and volume of traffic: a. In addition to the above, NZTA considers that further clarification needs to be provided on the volume and type of vehicles accessing the site via the vehicle crossing and how the conclusion in the ITA that no more than one slow, heavy, or long vehicle movement per week was reached. This is because accommodation, a restaurant, and spa and function facilities often require truck (or large vehicle) deliveries and/or the use of buses for the picking up and dropping off of guests. Note: In the PPM, one heavy vehicle arriving and leaving a site equates to two vehicle movement.	That clarification, further assessments and/or commitment is made by the applicant in relation to providing: 1. An amendment to the design of the vehicle crossing to the application site so that it is consistent with the Diagram E standard of the PPM. The design must be undertaken in consultation with NZTA. 2. Further clarification on the ITA calculations 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 work 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. 3. Further assessment from the applicant to determine the	Yes, confirmed hearing attendance

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			4. Sightlines: a. The vehicle crossing sightlines are currently restricted due to vegetation and the geometry of the road and this requires careful consideration given the type and volume of traffic that would be using the proposed vehicle crossing. In this case, the posted speed limit along SH6 in this location is 100km/hr, which typically warrants a minimum sightline distance of 282m in each direction as guided by the PPM. Whilst it is acknowledged that the operating speed past the application site is likely to be lower due to the road geometry reducing the need for a 282m sightline, NZTA considers that further assessment is required to determine the appropriate sightline distance that should be achieved and maintained. b. Despite section 7.3.3 of the applicants ITA advising that a more detailed assessment would be carried out in the future to determine what the appropriate sightlines would be, NZTA notes that this needs to be assessed now, not later, to determine whether the location of the vehicle crossing is appropriate to mitigate potential adverse safety and efficiency effects on the SH6 network. Importantly, if vegetation is required to be removed to increase the sightlines, then an appropriate condition would need to be imposed on the land use consent to ensure that these sightlines, supported by an approved vegetation clearance plan, were maintained throughout the duration of the operation. 5. Driveway Gradient/Safe Egress: a. Due to the contours of the application site and adjoining state highway road corridor, to achieve safe access it is recommended that there is a level approach (platform of no more than 2%) for 10m from the nearest white line of the carriageway. This would be fit for purpose for the majority of vehicles, including emergency services, and would also assist with sightlines along SH6. b. Section 7.4 of the ITA notes that engineering solutions would be considered to reduce the gradient of the driveway to comply with the relevant guides and standards of the Buller District Plan. NZTA therefore considers it appropriate that this extends to within 10m of the nearest white line of the SH6 carriageway, so that a platform of no more than 2% is achieved for the reasons discussed above. 6. Slope stability/property boundary adjoining SH6: a. The application does not discuss the earthworks that would be required in and adjacent to SH6 to support the upgrade of the vehicle crossing and to assist with increasing the sightlines at the access, including an assessment on how potential adverse effects on the SH6 road corridor would be managed, if necessary. b. NZTA therefore considers a detailed geotechnical assessment on the potential adverse effects specific to SH6 to be appropriate. Also, it is important to note that any earthworks undertaken as part of the proposal must not impact upon the ability for stormwater to drain from the SH6 road corridor.	appropriate sightlines that should be achieved to ensure safe access to and from the state highway. This should include a clear site plan showing the area of vegetation that would be removed with a condition of consent volunteered by the applicant requiring that the area identified on the plan be kept free of vegetation or that vegetation be maintained to a maximum height (the maximum height would need to be determined in consultation with NZTA) to ensure sightlines are maintained throughout the duration of the operation. 4. An amendment to the proposal to ensure a level approach (platform of no more than 2%) for 10m from the driveway and vehicle crossing to the nearest white line of the carriageway is achieved. 5. An assessment of the potential slope stability and stormwater effects on SH6 associated with the upgrade of the vehicle crossing and removal of vegetation to increase sightlines along the property boundary with SH6.	
8. Richard Arlidge	1 Hartmount Place, Punakaiki	Neutral	1. The scale of the proposed lodge and multiple cabins, along with associated infrastructure, will visually dominate the natural landscape, diminishing the scenic amenity that attracts visitors to Punakaiki and the Coast Road. 2. Unsupported assumptions: a. “It has been recognised that Punakaiki has a severe lack of visitor accommodation offerings, particularly in the luxury market ...”		Yes, confirmed hearing attendance

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			There is no reference as to what informs this statement/opinion. Punakaiki has a wide range of visitor accommodation offerings from camping to four-star comfort. In total there are currently 800 beds available in the greater Punakaiki area. The proposed addition of fifteen units 30-40 people will make a small addition to what is on offer. There are currently four eating establishments offering a narrow range of over-priced mediocrity. 3. Transport Assessment: - The speed limit on this section of SHW 6 is 100 km per hour and when travelling from the north to the south the road is descending towards Punakaiki. Assuming the average speed of 70km/hr is NOT a reasonable assumption. If the road is widened and sight lines increased (as proposed in the ACG Properties application) then average traffic speed of passing vehicles will naturally increase towards 100 km/hr. - The sight lines are also restricted because the road curves away out of sight to the north (left) and south (right). The road is very narrow to the north. If a vehicle is turning right off SHW 6 into Punakaiki Wild and waiting for north bound traffic to clear then all traffic behind must come to a stop. The road will need to be widened to three lanes to accommodate right turning vehicles. - There are two bus services that operate daily both north and south on SHW 6 between Westport and Greymouth. East-West Coach Lines based in Westport and operate daily while InterCity buses based in Nelson operates four days per week in the winter and daily in the summer. (A simple internet search via the WWW would have revealed this to the writer). Coghlan's Lookout is used as an occasional drop-off point for buses travelling northwards and is occasionally used as a turning bay for buses. The Truman Track car park is used as both a pick up and drop off point in northward and southward directions by InterCity buses. - Traffic flows at the peak of the visitor season are 1800 vehicles per day and these are mostly between the hours of 9am and 6pm. Average traffic flows are irrelevant. Tourism on the West Coast is highly seasonal. The peak visitor season is from November to March with a dramatic drop-off in April. There are 500,000 visitors annually to Dolomite Point the majority of which occur in the summer season. - Crash history a concern, The road to the north is tight and requires a high level of concentration by drivers. 4. Traffic Generation and Distribution - The calculations of total vehicle movements do not take into account the vehicle movements of staff movements and the vehicles servicing the business, being laundry supply, gas delivery, food delivery, beverages deliveries, waste removal, building and property maintenance etc. There are models of the level of service delivery at other West Coast tourism operations. - I believe that 99 vehicle movements per day is an underestimation. - There will be an increase in walking and cycling. - The diagram supplied does not create enough room for right turning vehicles from the north having room to wait and allow traffic to pass on the inside lane. 5. Connectivity - The ACG Properties Ltd application is to increase the number of people using this section of SHW 6. People staying at Punakaiki Wild will be wanting to access Truman Track less than 1km to the south. There is currently a walking/cycling track from Pororari River village north to Truman Track. People staying in Hartmount Place/Ross Place walk on the side of SHW 6 between Truman Track and Hartmount Place. Visitors to Punakaiki Wild will seek to access Truman Track. A safe walking and cycling pathway from Truman Track north to the entrance of Punakaiki Wild is essential. A sensible addition to the local tourism infrastructure would be a walking track from		

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			the junction of Hartmount Place and Ross Place northward across DOC land to the lower area of Punakaiki Wild - approx. 500 metres. This track would create a natural round trip for Punakaiki Wild guests exploring Truman Track and safe walking access for restaurant customers returning to Hartmount Place. A walking track to the south to connect with Hartmount Place would be very valuable in a post AF8 (Alpine Fault) event when SHW 6 will likely be blocked with falling rock and other debris. 6. Ecology a. There is a colony of Parekareka / Spotted Shag / Blue Shag (<i>Stictocarbo oliveri</i>) that nest and roost on the coastal cliff ledges on the northern face of the proposed Punakaiki Wild site. These birds may breed at any time of the year. b. Kororā / Little Blue Penguins (<i>Eudyptula minor</i>) nest in the caves above the beaches below the Punakaiki Wild site. Any evening activities need to be aware of the Kororā habits.		
9. Fiona McDonald	Address for Service – CMB 62, Punakaiki, RD1, Runanga, 7873	Neutral	I am a local of this area for over 33 years, and I have a strong interest in maintaining and improving the extraordinary and unique biodiversity that exists in this location. The ongoing development of this area needs to be done in a careful and considered manner in order to preserve what it is that makes this environment so unique. 1. Important that this project adheres to strict environmental standards and sustainable development principles, during both construction and operating to ensure the protection of this unique coastal ecosystem for present and future generations. 2. Need to protect bird species - Cormorants a. The Punakaiki Area, including Perpendicular Point is part of an “Important bird area” as defined by Birdlife International, for Westland Petrels and Spotted shags. An Important Bird and Biodiversity Area (IBA) is an area identified using an internationally agreed set of criteria as being globally important for the conservation of bird populations. b. I note that in application part 3.3 Flora and Fauna / 3.3.2 Terrestrial ecology, I could not find any mention of the cormorant/shag colony on the northern cliffs. It’s possible I missed it, but not seeing it included was very concerning. Therefore I believe further work needs to be done by an expert local knowledgeable about this area. I can recommend Matt Charteris as a solid choice, as he has good local knowledge. c. Need to study the cormorant colony along the northern cliffs to determine whether flight paths go over or around the headland. d. Use survey data to inform the development, minimizing interference with their habitat. e. If necessary schedule major construction activities outside breeding periods. f. Enforce a strict ban on drone use, as noise and movement may disturb colonies significantly. g. Kerry-Jayne Wilson (who is no longer with us) had monitored this colony for about 10 years. But her records are unable to be located. She was concerned about the condition of the colony, with poor/low breeding and some years with zero, so on the face of it it would appear this colony may need extra protection from risk factors incurred by the development. 3. Need to protect bird species – Taiko (Westland Petrel) a. These birds breed in the area and it is the only place on earth that they ever touch land for breeding. It is vital that they are extended the highest level of protection possible. b. These birds are highly sensitive to disturbances, especially light pollution and ground threats. c. Avoid construction or any activity requiring extra lighting during hours of dusk to dawn during the breeding season to minimize disruption.		Yes, confirmed hearing attendance

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			d. Implement guidelines for light management. Use special coatings or other methods on building glass to prevent light spill, and ensure window coverings are used after dusk e. Research what is done in other locations around the world where light spill is an issue for protected and endangered species and use this research to come up with a solid plan. f. Recognize that a downed petrel unless rescued will most likely not survive. This is due to the need for height for the petrel to become airborne and the increased risk from predators when they are stranded on land. g. Implement an ongoing plan for rescuing downed Petrels if they do fall out around the construction site and the operating hotel h. Attached to this submission is snapshot of petrel fallout around Punakaiki during the last patrol season. Which shows the effect of lighting on the Petrels with increased fallout around the highly lit hotel areas. i. Without this community Petrel patrol the damage to the species numbers would have been much greater, with a total of 58 petrels rescued alive this last breeding season, purely by us community members going out at night and searching for the fallout victims. There were also 13 found that had perished. 4. Need to protect bird species – Korora (Little Blue Penguins): a. Avoid any disturbance to any nesting sites at all times of the year. b. Conduct detailed surveys to identify nesting and travel routes. With ongoing monitoring in this area c. Prevent resort guest access to the fragile and dangerous coastline below the resort where the Korora are likely to be, and is also a risky location for guests to be using. d. Prevention of access to these areas will ensure this vital area is left wild for the resident penguins 5. Need to protect bird species – Pacific Reef Heron: a. Confirm whether the pair observed on the Coast in recent times are breeding locally, and assess any risks posed by the development. b. Implement protective measures to avoid disturbance if nesting is confirmed. c. Consult experts like Matt Charteris for further information and protection strategies d. This bird is rare and if found along this coastline may in fact attract an exclusive patron drawn by this possibility. 6. Lighting a. Design all site lighting to prevent spillover, using directional fixtures and coatings. b. Mandate window coverings after dark across the site. c. Consult with experts in this field to enhance the dark skies and make them a valuable asset for both the wildlife and the guests. 7. Building Placement and Design a. Consider the location of the main lodge, particularly its proximity to the end of Te Miko Point. Is it necessary to position it right at the point. b. This aspect is concerning to me due to potential threats to wildlife, wind/storm damage and significant impact on scenic values. c. This site is one of the most photographed vista’s on the West Coast with most visitors who drive the coast road stopping at this lookout and viewing this unique diverse coastline, looking directly at the site.		

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			d. If situated at the end of the promontory, the design should blend seamlessly into the landscape, respecting the site's cultural and historical significance. e. Architectural strategies should aim to minimize visual impact and preserve natural and cultural integrity. 8. Environmental Management During Construction: a. Create protocols to prevent rubbish and debris from dispersing, especially during windy conditions. b. We have an extremely high intensity wind that is often not considered, which comes from the East, both North East and South East. It is a highly destructive wind that in Cyclone Ita destroyed or damaged somewhere up to 200,000 hectares of forest. c. It doesn't however take a Cyclone for these winds, as we have experienced highly destructive easterlies on many occasions, which you can see with the naked eye whipping up off the point of TeMiko. d. It is vital that construction waste is monitored on a regular basis during construction, and one person is responsible for this on a daily basis, as other local construction sites have proved to have a less than adequate management strategy for waste during construction periods. The high wind zone makes it particularly vulnerable to the distribution of debris. e. All waste storage areas should be roofed to prevent waste from becoming airborne and reaching the sea or forest. f. Consider the possibility of some type of temporary caged (roofed) area to house the construction materials and waste, wind is a serious issue in this location, and construction waste is a known environmental issue. 9. Community Benefits and Engagement a. Promote local employment and partnerships perhaps not only for the environment but also for the arts. b. Look to a future benefit to the indigenous species, such as extending financial support to help maintain community initiatives such as the Westland Petrel rescue group and also the West Coast Penguin Trust c. Plant indigenous species to enhance biodiversity and create habitat corridors for songbirds like fernbird, which will create added benefit for patrons of this development. d. Promote environmental appreciation among guests through conservation initiatives. 10. Commitment to No Helicopter Landings and Preservation of Scenic and Environmental Values a. I hope for a firm commitment to prohibit helicopter landings, reserving this only for emergency situations. The area's scenic and amenity values are irreplaceable, and preserving the lifestyle of local residents is paramount. b. Frequent helicopter flights have been shown to significantly impact community well-being, as evidenced by residents near the Glaciers in South Westland. c. Additionally, helicopter noise and activity may pose threats to sensitive wildlife species such as shags / cormorants, and other resident birds, disrupting nesting and habitat stability. This region serves as a vital refuge, and maintaining its ecological integrity is essential for the survival of endangered species in this area and the region's overall environmental health.		
10. Marie Elder	Hartmount Place, Te Miko, Punakaiki	Oppose	1. Application is incomplete/contains insufficient information: a. Outstanding approvals from Ngāti Waewae, Waka Kotahi [NZTA, for site access], the NZ Fire Service, or DOC		Yes, confirmed hearing attendance

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			b. Consent cannot be granted without designs for Stormwater management, lighting, earthworks, specific foundation designs, topography, an engineering solution to access gradient, dust management, a CMP to manage “dirty water”, and geotechnical mapping of hazard areas. c. The application is silent on the site's immediate proximity to the Punakaiki Marine Reserve (est 2014), which starts at Perpendicular Point and extends to the Barrytown Flats, covering 35square kilometres. Does the applicant plan to excavate beach pebbles from the adjacent beach for the lodges’ “textured flute render mixed with a high content of local beach pebbles” d. Uncertainty about helicopter usage on the site, could have adverse effects on neighbouring Scenically Sensitive Residential area; the biodiversity of the site and its surrounds; and the fledgling Dark Sky Project. Should be part of this application if intended. e. No details on safety measures to combine licensed premises with accommodation close to cliff edges and highly exposed storm events. f. 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 AFB 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. g. Effects on adjoining neighbour, Carolyn Hewlett and Will Smith, are not considered despite access only 40m away. No viewpoint imagery from neighbour. Residents would be affected by lighting, by moving car headlights, by accessway vehicle noise, and by the noise of 140 people at a function. The assumption of 'unlikely ... confusion' 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. 2. Application contains unsupported assumptions and factual errors: a. I cannot find supporting data for several assumptions in the application, including: i. "It has been recognised that Punakaiki has a severe lack of visitor accommodation offerings, particularly in the luxury market" p11' ii. " ... 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. iii. " ... 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? b. "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] ofwhich are heavy vehicles'. Most of these heavy vehicles will also pass the site. c. 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. d. 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. e. 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.		

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			3. Transport Assessment, Access and Traffic Generation a. 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. b. 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 Punakaiki, 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. c. 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. d. 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. e. The calculations and numbers given throughout Section 6 for expected vehicle movements leave me baffled. The writer concludes "Overa/1 then ... 99 vehicles per day" [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. f. 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. g. 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] 4. Lighting a. The lighting report from 30 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. b. 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. 5. Water Supply a. 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. 6. Benefits to local or regional economy a. 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.		

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11. Roy Arbon	Flat 5/3 McGowan Street, Runanga	Oppose	Change of land use from rural to commercial Breach of rules for Punakaiki Character Area Access to site from Main Road is very dangerous		Yes, but currently an active missing person
12. Wendy Bullard	4 Ross Place, Te Miko, Punakaiki	Oppose	Road Access - Very difficult road access, no clear visual of highway 100m either direction - Poor condition of SH6, arriving from the north is very dangerous cliffs with rockfall each day. SH6 needs a major fix before we can attract more tourists and visitors, also locals. A shute system like in Arthurs Pass is the kind of fix this part of the road needs, especially being a very unstable geographic area. Water Supply - Clean drinking water is compromised by the amount of people staying over summer and rainfall not being enough to sustain this small town at all. Tourists cannot be sustained on our local water supply as it is only just coping with locals and it's a very divisive point in the community. Cannot sustain extra pressure from the resort. Has rainwater collection been considered as an option in these changing times? Heritage - Concern over access to local caves and scared areas including the area of the Te Miko ladders of pre 1700, shelter caves and Te Tai Poutini national park.		No, but will attend hearing as an observer
13. Teresa Wyndham-Smith	33 Hartmount Place, Punakaiki	Oppose	Detail of accommodation options in Punakaiki is incorrect - Section 2.2 of application - No evidence cited that "Punakaiki has a severe lack of visitor accommodation offering particularly in the luxury market. There is a range of accommodation available, including in the wider Punakaiki area to the north and south, booking in advance is highly recommended and outside of peak times it is very easy to book a place to stay. Punakaiki Marine Reserve - Section 3.1 of application - No mention of the Punakaiki Marine Reserve on the western boundary of the property. - The marine reserve is one of five marine reserves established on the West Coast in 2014. Punakaiki Marine Reserve covers more than 35 square km from Te Miko/Perpendicular Point [so has its northern start point at the property boundary] to near Maher Swamp in the south, and out to two nautical miles from shore. Paparoa National Park and the marine reserve combined protect heavily forested land and water catchments from the mountains out to sea. - The Punakaiki reserve protects a wide variety of marine species and habitats, including kelp forests, rocky reefs, and sandy seabeds. It is a sanctuary for species such as blue cod, paua, crayfish, and various types of sponges and anemones. Its ecosystems are relatively undisturbed making them important refuges for marine life. - The application fails to even acknowledge the existence of the Punakaiki Marine Reserve so totally lacks any information about the impacts of the development on the reserve and what will be done to protect it. - Section 4.2.2 of application - The lodge will be "finished in a highly textured vertical flute render mixed with a high content of local beach pebbles". Where are these coming from? There's no acknowledgement that removing natural materials, such as pebbles, from beaches requires permission or resource consent. It is illegal under the Marine Reserves Act to remove any stones from a marine reserve.	- I seek acknowledgement of Punakaiki Marine Reserve and protections which will be put in place to ensure the reserve is not harmed by the development. - I seek an evidence based Transport Plan with comprehensive detail about how the critical dangers of the entry/exit will be managed and that this plan is approved by NZTA. - I seek the lodge and all associated infrastructure to be totally self-sufficient for all potable water and not have access to the Punakaiki water supply intake. - I seek acknowledgement of the importance of the Westland Petrel/taiko to the Punakaiki area and measures put in place to safeguard it in terms of lighting used by the development.	No

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			3. Traffic Generation and Access a. Section 3.6.1 of application - In this section it is claimed: “Despite a posted speed limit of 100 km/h, the highway's alignment and narrow carriageway likely reduce speeds to around 70 km/h due to its gradient and horizontal curves.” Where is the evidence for “likely reduce speeds”? There is none because there can be none, it’s a totally meaningless statement without anything to back it up. b. I’ve been commuting on this road for 10 years and have acutely observed motorists’ driving behaviour [including that of tradies commuting between Greymouth and Westport, tourists, milk tanker drivers] over this time. The statement totally ignores that from the south the road travels mostly straight up hill (apart from one bend before Coghlan's Lookout) from the Truman Track. Many drivers are most certainly travelling 100km/h as they pass the property. c. Milk tankers are significant users of the road in summer both in the morning and the evening so likely to overlap with the busiest times for visitors coming and going. One of the crashes referenced in the transport section of the application was a milk tanker which slid across the highway and ended up with its trailer down a bank just metres south of the property. d. There’s significant truck traffic on the road including deliveries between Greymouth and Westport and a lot of tradesperson traffic particularly in the mornings and evenings. e. This section also claims the area “lacks footpaths, cycling infrastructure, and bus services, reflecting its rural nature”. This again points to lack of real knowledge and evidence about Punakaiki. There are four bus services per day passing through Punakaiki (and therefore past the property). The East-West Shuttle service travels every day [apart from Christmas] from Westport in the morning to Chch International Airport return stopping at Punakaiki on the way there and back. The Intercity bus service is daily from Nelson, stopping at Punakaiki and going on to Fox Glacier, the return service travels the same route daily. f. There is a shared pedestrian and cyclist pathway from Truman Track, about 500m south of the property all the way through to the Punakaiki River on the southern boundary of the township. g. Section 6.3.1 of application - This section speculates that “The somewhat remote location of the site means that those choosing to stay there will be unlikely to be regularly travelling to and from their cabin – rather, those that choose to stay there are likely to remain generally based at the site. As such, the additional vehicle movements associated with the site are negligible in the context of the capacity of SH6.” h. Where is the evidence for the thinking behind this? People come to Punakaiki for the Pancake Rocks, the Paparoa Track, the Pororari River Track (touted as one of the best half day walks in the country). The award winning Punangairi complex with its multi-media exhibition about the Punakaiki area, the Department of Conservation visitor centre and other amenities is also becoming a major drawcard. A new lookout track behind Punangairi is nearly finished – all part of encouraging people to stay longer around Punakaiki as there’s so much to do. From my observations of the tourism sector, and having previously run an accommodation business, I think it’s highly unlikely most people aren’t going to go out and explore everything which is on offer. 4. Water Supply a. Section 4.4.1 of application - The application says the Punakaiki water supply will be used for potable water. The applicants may not be aware the Punakaiki Water Supply has been sabotaged at the intake (which is on the other side of the highway very close to 4663 SH6) on several occasions as recently as late March/early April 2025. Despite this being a criminal offence no one has ever been charged so it is highly likely it will be repeated. b. The Environment Court has also been involved in an issue to do with a small piece of private land the intake flows through. However, there has been no public disclosure about any result in		

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			this case so no allaying of concerns the community has about the security of the supply for the township. 5. Lighting a. Section 4.5 of application - In this section about lighting there is no mention of the Westland Petrel/taiko, a bird hugely important for the wider Punakaiki area and community. Fledglings' navigation is affected by light, particularly LEDs. Community members maintain a nightly patrol over November-January when the taiko are taking their first flights to sea. At least one taiko was found on the road in close proximity to 4663 SH6 during last summer's patrols.		
14. West Coast Penguin Trust c/- Inger Perkins, Manager, West Coast Penguin Trust	Address for service: PO Box 56, Hokitika	Neutral	1. Kororā (Little penguins) a. Little penguins are known to nest along the rocky coastline in the area of the consent application, sometimes in caves, between Truman Track beach and Perpendicular Point and more generally between Punakaiki river mouth area and White Horse Creek. They are also reported to be present in the small bay at the western edge of the property. b. 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. c. It would be helpful if any records of penguins seen/found could be kept and shared with the Trust. 2. Tāiko (Westland petrels) a. The attraction to artificial lights is rated as a relatively low threat but with high uncertainty around the numbers of individuals affected each year. Most petrels disorientated by lights will be fledglings on their maiden flight and most have been found between 16 November and 15 January. However, a few birds are found downed by lights between March and early November and these will be adults or pre-breeding birds. b. Westland petrels are disorientated and downed by the lights of Punakaiki and to a lesser extent Westport, Greymouth and Hokitika. c. When disoriented by lights, petrels land beside lights or where the lights have disoriented them (e.g., vehicle headlights) in places where they are generally unable to take flight again leading to death due to vehicles, starvation or attacks by other wildlife or dogs. d. The threat of any bright lights will be additional to the many threats already faced by these birds. Lighting for the site will need to comply with the <i>National Light Pollution Guidelines for Wildlife</i>, published by the Australian Department of Biodiversity, Conservation and Attractions¹. e. 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. f. Seek solutions to minimise light spill from windows especially dusk to dawn, mid-November to mid-January. g. Prepare and implement a plan for rescuing any downed petrels in conjunction with the Department of Conservation. 3. Parekareka (Spotted (or blue) shag) a. The spotted shag (<i>Stictocarbo punctatus</i>) nests on the cliffs of the northern edge of the property. b. This colony and site appears to be included in Birdlife International's list of Important Bird Areas and linked to Punakaiki and the marine reserve.	1. 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. 2. Tāiko (Westland petrels) a. Lighting for the site will need to comply with the <i>National Light Pollution Guidelines for Wildlife</i>, published by the Australian Department of Biodiversity, Conservation and Attractions. b. 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. c. Seek solutions to minimise light spill from windows especially dusk to dawn, mid-November to mid-January. d. Prepare and implement a plan for rescuing any downed petrels in	No as per submission but now wishes to be heard

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			c. It is not known whether and if so how development at the site might impact birds nesting on the cliff. It seems likely to be a low risk but it would be helpful to explore this risk and ensure any risk of disturbance is avoided. d. Establishing regular monitoring of shags present and nesting on the cliffs, ideally monthly, would be invaluable and would contribute to understanding of the species here and then to better conservation outcomes. e. 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. 4. Other coastal birds a. We understand that little pied shags (At Risk – Relict, <i>Microcarbo melanoleucos</i>) also nest on the north facing cliffs, perhaps more commonly than the spotted shag in this location. b. A pair of reef herons (Threatened – Nationally Endangered, <i>Egretta sacra</i>) have been reported in the area. c. It would be helpful to establish a record of all birds seen by staff and guests. It would be of interest to guests and useful information gathering. d. There are community predator control projects in the Punakaiki/Barrytown area and adding predator control on the property would extend that effort and be beneficial for all native species. 5. We expect the highest environmental standards to be met through the site restoration and construction and operation of 'Punakaiki Wild'. We will be pleased to continue to liaise with the owners and project managers to offer any guidance based on our knowledge and experience, and we recommend seeking local seabird ecological advice to advance the project.	conjunction with the Department of Conservation. 3. Parekareka (Spotted (or blue) shag) a. It is not known whether and if so how development at the site might impact birds nesting on the cliff. It seems likely to be a low risk but it would be helpful to explore this risk and ensure any risk of disturbance is avoided. b. Establishing regular monitoring of shags present and nesting on the cliffs, ideally monthly, would be invaluable and would contribute to understanding of the species here and then to better conservation outcomes. c. 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. 4. Other coastal birds a. It would be helpful to establish a record of all birds seen by staff and guests. It would be of interest to guests and useful information gathering. b. There are community predator control projects in the Punakaiki/Barrytown area and adding predator control on the property would extend that effort and be beneficial for all native species.	

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15. Westland Petrel Conservation Trust c/- Denise Lyla Howard (Trustee)	c/- Denise Lyla Howard, CMB 43, RD 1, Runanga 7873	Oppose	1. Lighting The applicant has not provided adequate mitigation of the likely effects of lighting on Westland petrels 2. Shag colony on the Northern Cliffs The applicant fails to document the established shag colony on the Northern cliffs of the property 3. Lack of comprehensive predator control programme The applicant fails to provide a comprehensive predator control programme to mitigate the impacts of increased human activity on the site/environment	Consent should be declined unless: 1. Appropriate controls must be placed with specific requirements to prevent negative effects on the Westland petrel 2. A comprehensive predator control programme be prepared to mitigate the effects of human activity on the site 3. A detailed and robust scientific study be undertaken and a plan prepared to mitigate the increased human activity in the area of the breeding colony of the shag.	Yes, confirmed hearing attendance