

S92 RFI – Addendum to Landscape Assessment Report

RE: RFI for Resource Consent Application RC240079, Punakaiki Wild

2 September 2025

This report is prepared by Rough Milne Mitchell Landscape Architects (**RMM**) in response to a Request for Further Information (**RFI**) from the Buller District Council concerning the above application, along with proposed changes to the lodge design and a reduction in the number (three) of cabins being advanced by the applicant.

The following report is an addendum to the original assessment and shall also be read in conjunction with the RMM Addendum #1 issued on the 14 March 2025. This report addresses landscape and visual matters raised by submitter Ms Carolyn Hewlett¹ who resides at 4655 State Highway 6 (**SH6**), as noted as matter 10 in the Buller District Council RFI dated 25 June 2025. As outlined above, I make comment on the proposed changes to the application being advanced by the applicant (*refer updated architects' drawing package and the masterplan as attached as Appendix One to the report*).

In the preparation of this addendum, I have not undertaken a further site visit, rather I have relied on photographs supplied by the applicant, as well as the knowledge of the site and the submitters property gleaned from previous site visits. The photographs supplied have been taken from the site looking towards the submitter's property at 4655 SH6. A review of the level of effects identified in each of the viewpoints contained in the original assessment has also been undertaken.

Revisions to the Application

I note that following lodgement of the application (and arguably in response to submissions) some changes have been made to the lodge design and the number of cabins. These include:

- A reduction in the number of cabins proposed - three cabins (SC3, FC5 and FC6) have been removed from the proposal. Cabin SC3 has been removed from the northeast quadrant of the site while cabins FC5 and FC6 were previously shown adjacent to the southwest boundary of the site.
- The lodge has been re-designed resulting in a reduction in scale (floor area) and rather than a singular building comprises two building elements significantly reduced in scale, but now forming two building elements that 'face each other'.

Reduction in Cabin Numbers

Regarding the reduction in cabin numbers, it stands to reason that less built form on site will result in a potential reduction of adverse landscape character and visual effects arising from the proposed built form of the original application. It had been identified that from only Viewpoints 4 and 5 that some of the cabins (including SC3 and potentially FC5 and FC6) would potentially be visible. However, it was deemed that due to viewing distance, the small scale of these buildings and the recessive cladding colours they will not appear prominent. Furthermore, they will be absorbed into the site and visually mitigated by the proposed amenity planting. It was considered this revegetation will also enhance the topography and natural character of the site.

¹ Owner/occupier of
Pt Section 13 Blk IX Brighton SD (NL87/135)
– immediately to the south of the site

64 3 366 3268
info@rmmla.co.nz

We do not resile from our original position in that adverse visual effects on landscape values will be **moderate** in the short-term during construction but will increasingly reduce overtime to **low** post construction and as the vegetation / native forest establishes and matures. While the reduction in cabin numbers by three assist in the perception of a slight lessening of effect, our position remains the same as our original assessment. Similarly, we remain of the view that overall; the proposal will have a **very low** degree of adverse effects on the landscape values of the site and its receiving environment.

Proposed Change to Lodge Design

As noted, the lodge design has been revised. Rather than one building that was approximately 621.2m² in area the design now consists of two buildings totalling 281m² with an associated alfresco dining area of 150m² in area. This represents a significant reduction in size of the proposed lodge.

The lodge is proposed to be located within the same area of the site as the original application, with similar materiality, glazing and colours proposed. Previously when viewed from higher elevations the lodge read a 'S' shaped in form. The revised design will now read as two separate forms, albeit from the identified representative viewpoints, it will be seen a slightly 'dislocated S' shape.

The real benefit, aside from the building being smaller, is that a lodge building that comprises two separate but related built forms allows the landscape to flow between and through these two buildings. This means rather than reading as one mass, the lodge will be viewed as two buildings spatially separated. It is acknowledged that this will be mainly perceived when viewed from close quarters, i.e. from within the site, and will have little to no effect on the perception of the lodge when viewed from viewpoints 1 – 3. However, from Viewpoints 4 and 5, the smaller and separated lodge building will be discernible and would potentially contribute to a lessening of adverse visual effects as experienced from these viewpoints. Notwithstanding that, fundamentally our original conclusions reached in regard to this remain.

The revised lodge is not located on a ridgeline, but it will break the skyline (as did the original application) from some viewpoints along the SH because it is located on the coastal edge of the headland. However, the undulating roofline means that from a visual perspective the lodge will still be difficult to distinguish as built form but rather appears to relate to the topography of the landform. Therefore, visual effects arising from a skyline intrusion will remain in the range of **None - Low**.

Submitter Concerns

Having read Ms Carolyn Hewletts submission we understand her main concerns relative to landscape character and visual effects are:

- Visual effects (including reflectivity) from 'afar' as a result of the location of the lodge and cabins;
- Visual effects (including existing dark sky experience) on Ms Helwetts property; and
- Is the proposal appropriate within a high natural character and outstanding natural character area.

Visual Effects from 'Afar'

We have previously concluded that visual effects, including effects relating to reflectivity, from distant viewing distances will range from **none to low** (reducing to very low as mitigation and enhancement planting establishes). We remain of this position. Reflectivity and glare will be controlled mainly through the setback of windows underneath the eaves in all buildings proposed for the site. The reduction in cabin numbers as well as the size of the lodge means the potential source of reflective, and glare is lessened. Proposed materiality and paint colours all have low light reflectance values (**LVR**).

Visual Effects on Ms Hewlett's Property

As stated above a site visit has not been undertaken to specifically understand the viewing context from the submitter's property. However, photos taken from adjacent to Ms Hewlett's property, and photos taken from within the site looking toward the submitters property have been used to inform the following comment.

The submitters dwelling sits within a semi-mature to mature bush/treed setting. Views are afforded through this vegetation across the site and out over the Tasman Sea. Given the maturity of the bush and trees these views are interrupted in places by tree trunks and tree canopy. The closest building (Proposed Worker Accommodation, Laundry and Client Services Building) is some 400m from the submitter's property. Cabins FC5 and FC6 that would have been viewed semi adjacent to the Proposed Worker Accommodation, Laundry and Client Services Building have been removed from the application, therefore lessening the amount of built from potentially seen when looking in a north westerly direction from the submitter's property.

Given the information at hand, we stand by our original assessment that any potential adverse visual and landscape effects can be either adequately avoided or mitigated. This is applicable to this submitter's property as well. Regarding night time lighting and 'dark sky' effects there is no doubt built from within the site will result in more lighting than currently exists. There is no escaping that. However, we are satisfied that the measures proposed to control lighting, and light spill are appropriate and having been involved in several projects where similar effects have been managed are confident this will be the case here.

Appropriateness of the Proposal in this Location

The HCNC and OCNC and the ONL values are inter-related because the ONL values are largely derived from the overwhelming natural character of the West Coast. In this regard the natural character values are related to a scale much broader than the site (as identified by NCA42 and NCA44). The site then forms a very small component of the bigger picture. The landscape values relating to the receiving environment including natural character have ground-truthed on site and identified at Section 4.3 in the LAR.

Although the proposed development is within an area of HCNC, the site has been modified by pastoral farming and therefore on the 'spectrum of naturalness' has a lower level of natural character than the balance of the site and the adjoining land within the receiving environment, which is dominated by a very high level of natural character. This is a characteristic of the West Coast in general, where outside the main towns the majority of the land is within the coastal environment with much of it being conservation land / Crown land / reserve land.

The aspects to take into account in the assessment of the effects on natural character are broadly encompassed by a consideration of the context, existing character, the history of development in the receiving environment, what is anticipated by the district plan, the scale and elements of the proposal and any benefits arising from the proposed development.

A detailed assessment of this was contained in the original assessment and further described in the RMM addendum dated 14 March 2025. We will not repeat that here. Suffice to say the proposed development is considered small in comparison to the overwhelming scale of the receiving natural character landscape elements and features and will respond to the context and natural characteristics of the site by locating built elements within the HCNC area of the site that is mainly pasture and avoiding the steeper OCNC areas of the site that are mainly forested.

Further, the bespoke, organic form of the architecture and other built form will utilise recessive colours and materials that display the vernacular and contribute to a sense of place. In addition, the location of the built forms will avoid identified waterways, comply with the setbacks from waterways and wetlands and avoid the need to remove areas of indigenous vegetation for construction.

In terms of an experiential recognition of what is natural character, a development becomes inappropriate when it diminishes in any significant way the natural character of a reasonable person's perception of it. The visual assessment indicates that the introduction of unnatural elements (being the built forms and tracks that are part of the proposed development) in overall vistas of the landscape will not overwhelm the site to the point where modification of its natural character is detrimental.

We trust this satisfies the further matters raised.

RMM Landscape Architects

Nikki Smetham
Technical Team Lead
Senior Landscape Architect
0275 326 676
nikki@rmmla.co.nz