



Form 13 – Submission on application concerning resource consent or esplanade strip that is subject to public notification or limited notification by consent authority



Form 13: Resource Management (Forms, Fees, and Procedure) Regulations 2003
Sections 41D, 95A, 95B, 95C, and 96, 127(3), 136(4), 137(5)(c), and 234(4), Resource Management Act 1991

Email to: planning@bdc.govt.nz
Deliver to: Planning Department, Buller District Council, 6-8 Brougham Street, Westport
Post to: Planning Department, Buller District Council, PO Box 21, Westport 7866

To: Buller District Council

Full Name of Submitter:

Fiona McDonald

Contact person [name and designation if applicable]:

Postal Address for service of person making submission:

Contact details:

Landline:

Mobile:

Email:

This is a submission on the resource consent application as noted below: (Enter application details)

Resource Consent Number: RC240079

Name of Applicant: ACG Properties Ltd

Site/Location: 4663 State Highway 6, Te Miko, Punakaiki

Proposed Activity:

Establish and operate a luxury lodge and visitor accommodation development, named 'Punakaiki Wild'

The application is for a resource consent for: (briefly describe the type, proposed activity, and location)

establish and operate a luxury lodge and visitor accommodation development, named 'Punakaiki Wild'

I am I am not (tick one) a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

If you are a trade competitor, your submission must:

- (a) relate to adverse effects on the environment; and
- (b) not relate to trade competition or the effects of trade competition.

The specific parts of the application that my submission relates to are: (give details)

Environmental and community obligations and commitments
Please see attached pdf file of my full submission document



My submission is: *(tick one)*

I support I am neutral I oppose

the application or specific parts of it: *(Provide details as appropriate)*

See attached pdf

The reasons for making my submission are: - *(please attach additional paper to your submission, if required)*

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.

I seek the following decision from the consent authority: *(give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought)*

I have attached my written submission to the parts I wish to address.

Yes **No** I wish to be heard in support of my submission *(tick one)*

Yes **No** If others make a similar submission, I will consider presenting a joint case with them at the hearing *(tick one)*

Signature/s of submitter/s *(or person authorised to sign on behalf of submitter)*

Signature: Date:

Name of person signing:

Signature: Date:

Name of person signing:

Signature: Date:

Name of person signing:

NOTES TO SUBMITTER

1. Council must receive your submission before the closing date and time for submissions on this application. Your submission can be forwarded to the Buller District Council at planning@bdc.govt.nz
2. You must serve a copy of your submission on the applicant as soon as reasonably practicable, at the applicant's address for service, after you have served your submission on the Council. Contact details are on the covering letter.
3. Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):
 - It is frivolous or vexatious;
 - It discloses no reasonable or relevant case;
 - It would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
 - It contains offensive language;
 - It is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.
4. The closing date for serving submissions on the Council is the 20th working day after notification. This date is recorded in the public notice or on the letter you received. Please ensure you comply with this date as late submissions may not be accepted.
5. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.
6. Pursuant to section 100A of the Resource Management Act 1991, you can request that the Council delegates their functions, powers, and duties required to hear and decide the application to one or more hearings commissioners who are not members of the local authority. If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than five working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commission or commissioner.

Fiona McDonald



Subject: Submission to the Punakaiki Wild application

I am neutral to this application

I am a resident of this area for 33 years.

I recently met with the developers of the proposed Punakaiki Wild resort.

I came away feeling that the developers have genuine intentions to create a project that while aligning with their business goals also respects and benefits the environment and the local community.

Their efforts to meet with us and their commitment to restoration planting of local species appear very positive.

I do believe that if a project like this is to move forward in this location, these applicants seem to be approaching it with care and sensitivity. I'm hopeful that the potential plan they've put forward if granted consent, will be carried through as thoughtfully and carefully as it has been presented, and that the intention of this resort to be "Wild" focused allows for added protection awareness and care for local species.

Some of what is mentioned below was discussed with the Applicants in our recent meeting, and is included here as follow up and confirmation of points we discussed.

I can not stress enough how important it is 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.

The two main points I wish to cover are the Avian and wildlife protection, and the effect on scenic values of the location of the main lodge.

Protection of Bird Species

My primary concern is the safeguarding of local bird populations some mentioned below but also including all other forest and coastal wildlife.

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.

Cormorants:

- **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.
- Study the cormorant colony along the northern cliffs to determine whether flight paths go over or around the headland.
- Use survey data to inform the development, minimizing interference with their habitat.
- If necessary schedule major construction activities outside breeding periods.
- Enforce a strict ban on drone use, as noise and movement may disturb colonies significantly.
- 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.

Taiko (Westland Petrel):

- 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.
- These birds are highly sensitive to disturbances, especially light pollution and ground threats.
- Avoid construction or any activity requiring extra lighting during hours of dusk to dawn during the breeding season to minimize disruption.
- 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
- 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.
- 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.
- Implement an ongoing plan for rescuing downed Petrels if they do fall out around the construction site and the operating hotel
- 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.

- 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.

I have attached at the end of this submission some screenshots of the locations of Petrel rescues performed by the community Petrel Patrol

It is important to note that these records are an excellent record that is very accurate for the areas patrolled by community members. They are not the ONLY birds that have been rescued and not the extent of distance that rescues have taken place. They are limited to the areas we covered and the records we took as a group. There will be many more that were not found.

Korora (Little Blue Penguins):

- Avoid any disturbance to any nesting sites at all times of the year.
- Conduct detailed surveys to identify nesting and travel routes. With ongoing monitoring in this area
- 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.
- Prevention of access to these areas will ensure this vital area is left wild for the resident penguins

Pacific Reef Heron:

- Confirm whether the pair observed on the Coast in recent times are breeding locally, and assess any risks posed by the development.
- Implement protective measures to avoid disturbance if nesting is confirmed.
- Consult experts like Matt Charteris for further information and protection strategies
- This bird is rare and if found along this coastline may in fact attract an exclusive patron drawn by this possibility.

Additional Considerations

Lighting:

- Design all site lighting to prevent spillover, using directional fixtures and coatings.
- Mandate window coverings after dark across the site.

- Consult with experts in this field to enhance the dark skies and make them a valuable asset for both the wildlife and the guests.

Building Placement and Design:

- 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.
- This aspect is concerning to me due to potential threats to wildlife, wind/storm damage and significant impact on scenic values.
- 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.
- If situated at the end of the promontory, the design should blend seamlessly into the landscape, respecting the site's cultural and historical significance.
- Architectural strategies should aim to minimize visual impact and preserve natural and cultural integrity.

Environmental Management During Construction:

- Create protocols to prevent rubbish and debris from dispersing, especially during windy conditions.
- 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.
- 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.
- Some recent data taken from a location further South at F21232 Fagan Creek rainfall station: is as follows
 - 29/04/25 - 76 km/hr wind gust from east
 - 17/05/25 - 48 km/hr wind gust from east
 - 06/06/25 - 91 km/hr wind gust from east
- **MetService wind forecast for these periods showed 10 km/hr South Easterly.**
- Easterlies persist for 2 to 3 days. Gusts can come at anytime in these periods without warning, and with ferocity.
- Often these winds come in the middle of the night when everyone is in bed including the construction workforce, and in the morning materials and rubbish may be nowhere to be seen.
- 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.

- All waste storage areas should be roofed to prevent waste from becoming airborne and reaching the sea or forest.
- 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.

Community Benefits and Engagement:

- Promote local employment and partnerships perhaps not only for the environment but also for the arts.
- 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
- Plant indigenous species to enhance biodiversity and create habitat corridors for songbirds like fernbird, which will create added benefit for patrons of this development.
- Promote environmental appreciation among guests through conservation initiatives.

Commitment to No Helicopter Landings and Preservation of Scenic and Environmental Values

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.

Frequent helicopter flights have been shown to significantly impact community well-being, as evidenced by residents near the Glaciers in South Westland.

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.

I hope that these points outlined above give a perspective that aligns with a commitment to responsible and sustainable development that benefits the environment and the local community.

Thank you

Warm regards,
Fiona McDonald

I have attached below screenshots of the locations of Petrel rescues performed by the community Petrel Patrol
It is important to note that these records are an excellent record that is very accurate for the areas patrolled by community members.
They are not the ONLY birds that have been rescued and not the extent of distance that rescues have taken place. They are limited to the areas we covered and the records we took as a group. There will be many more that were not found.

Image #1 Around the Punakaiki River Mouth and brightly lit accomodation

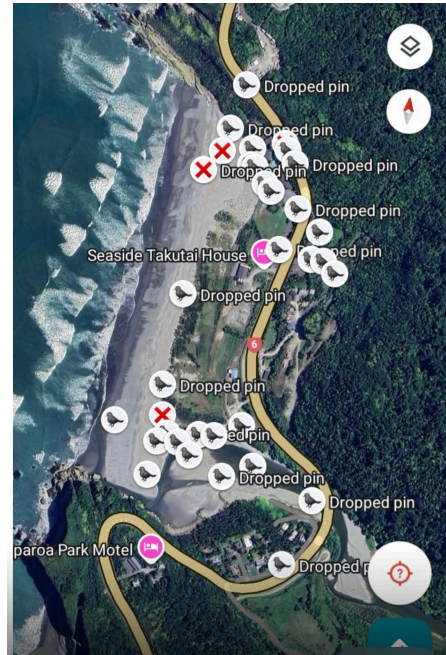
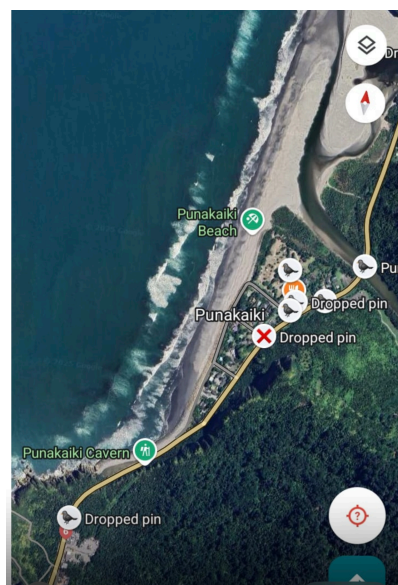
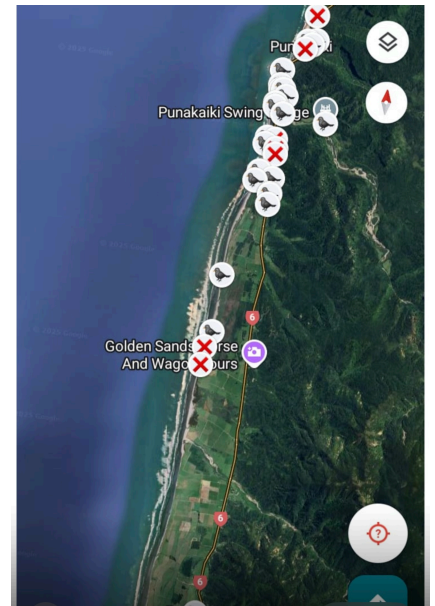
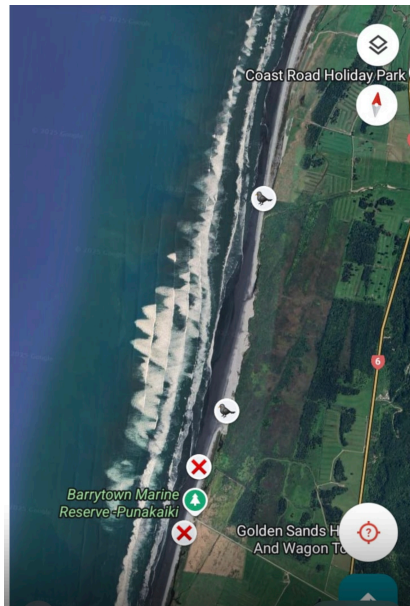


Image #2 Around the Punakaiki township



Images 3, 4 and 5 further south and wider view

Final image shows the area the patrol was looking.



Also taking into account there were likely many missed as we were often one person searching alone covering vast distances at night.

