

Memo

To:	Daniel Thorne, Town Planning Group	Job No:	2431
From:	Graham Ussher, RMA Ecology	Date:	5 June 2026
cc:			
Subject:	RC240079: Punakaiki Wild: RFI response regarding ecology conditions		

Dear Daniel,

ACG Properties Ltd has applied for resource consents (RC240079) from Buller District Council for a development at 4663 State Highway 6, Te Miko, Punakaiki.

Buller District Council issued a Request for Further Information (RFI) under Section 92 of the RMA for a number of ecological matters, to which ACG Properties provided a response on 12 April 2026¹, as well as modifications to consent conditions to reflect the updated ecological investigations, controls during construction, and management of the site post-construction.

Buller District Council has recently responded (24 May 2026) seeking a clear description that cross references the volunteered consent conditions (Attachment I of the Application) with the consent condition references in Section 7.0 of the updated RMA Ecology Ltd ecology report² (Attachment G of the Application).

Below we have provided a table that provides a clear comparison of the recommendations in the ecology report with the corresponding condition of consent.

In particular, we confirm that Condition 10 of the 'Volunteered Conditions of Consent' meets our recommendation for a comprehensive Condition of Consent, requiring the preparation of a Lighting Management Plan that will include appropriate measures to ensure the adverse effects on coastal birds, including Westland petrel, are negligible (as per bullet point 8 in Section 7 of the RMA Ecology Ltd Ecology Report).

We trust that this provides the assurance requested by Council.

Table 1. Comparison between the recommendations in the RMA ecology Ltd Ecology Report, and the volunteered condition of consent proffered by ACG Properties Ltd

Recommendation from RMA Ecology Ltd ecology report (section 7)	Corresponding volunteered condition that satisfies the Ecology Report recommendation
Stream 3 culvert installation in accordance with Clause 70 of the NES-F	<i>To be assessed fully for the consent application to West Coast Regional Council</i>
Stream 3 culvert earthworks to be undertaken in the presence of a suitably qualified ecologist (if the stream is flowing) who will check excavated material laid on the stream bank, and remove any found kōura and fish, and relocate them to the stream, downstream of the works area	<i>To be assessed fully for the consent application to West Coast Regional Council</i>

¹ RMA Ecology Ltd. 12 April 2026. Punakaiki Wild: further information request regarding ecological effects. 9 pp.

² RMA Ecology Ltd. April 2026. Punakaiki Wild, Te Miko, West Coast: ecological effects assessment. Report prepared for ACG Properties Ltd. 58 pages + Appendices.

Vegetation clearance protocols that will include, but are not limited to, the following measures: a. Clearance in general accordance with the development footprint design provided in the landscape drawing prepared by RMM Ltd; b. Clearance of grassland areas by progressive mowing to reduce the grass sward to a lot (100 mm) height prior to excavation; c. Clearance of shrubland outside of the native bird nesting season (October through to February); d. Clearance of shrubland using hand tools to cut shrubs, and relocation of cut shrubs to adjoining shrubland area for a minimum duration to 2 weeks prior to mulching, or leave cut shrubs at the relocation site indefinitely; and e. Clearance of shrubland to be undertaken in the presence of a suitably qualified ecologist, who will visually check cut vegetation for arboreal geckos.	Condition 9 (m) and (n) We note that part (e) there is no corresponding specific condition requiring that an ecologist is required to be on site for vegetation clearance to ensure that native nesting birds or lizards are not harmed, although this is implied through Condition 12.
No vegetation clearance works will take place within the location where fernbirds were recorded, including a 20 m buffer around these noted locations	Condition 9 (o)
Enrichment planting along Stream 3 to provide a contiguous, woody vegetation margin that is at least on average 5 m wide on each margin	Condition 9 (h)
That stormwater management proposals include measures to ensure that the level of sediment is the same as, or less, than the levels of sediment that are currently discharged into the site's ditches and streams, in order to avoid an adverse effect on the receiving environment, which includes the Punakaiki Marine Reserve	<i>To be assessed fully for the consent application to West Coast Regional Council</i>
A Lizard Accidental Discovery Response Protocol (see Section 5.5) to ensure appropriate measures are taken in the unlikely event that lizards are found within the works footprint.	Condition 12
Preparation of a Lighting Management Plan to ensure adequate measures are implemented to maintain lighting at a level that will not adversely affect wildlife, particularly nocturnal coastal birds including Westland petrel, little penguin and sooty shearwater, but also nocturnal forest birds including long-tailed cuckoo and great spotted kiwi. The Lighting Management Plan will follow appropriate guidelines such as those in the Australian Government's <i>National Light Pollution Guidelines for Wildlife</i>. The Lighting Management Plan will include, but is not limited to, the following measures:	Condition 10. We confirm that this Condition meets our recommendation for a comprehensive Condition of Consent, requiring the preparation of a Lighting Management Plan that will include appropriate measures to ensure the adverse effects on coastal birds, including Westland petrel, are negligible

a. Reduction of the level of effect of both internal and external lighting; b. Use of shields to prevent vertical spill of external lights; c. Appropriate mounting of external lights to reduce horizontal spill of light; d. Use of motion sensors to reduce hours of lighting to the minimum required when an area/ path/ track is in use; e. Use of appropriate warmth and Lux of lighting; and f. Use of blinds or window tints to reduce spill of light from internal sources.	
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Yours sincerely,



Dr Graham Ussher

Principal Ecologist ³

RMA Ecology Ltd

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³ This report has been prepared for the benefit of our Client with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose without our prior review and agreement. Any use or reliance by a third party is at that party's own risk. Where information has been supplied by the Client or obtained from other external sources, it has been assumed that it is accurate, without independent verification, unless otherwise indicated. No liability or responsibility is accepted by RMA Ecology Limited for any errors or omissions to the extent that they arise from inaccurate information provided by the Client or any external source.