

12 June 2026
Job No: 1095111

ACG Properties Limited
34a Wyndham Street, Papanui, Christchurch 8053

Attention: Connor Magides

Dear Connor

Punakaiki Wild, State Highway 6, Te Miko, Punakaiki
Alignment of the Natural Hazard Desktop Assessment with the National Policy
Statement for Natural Hazards 2025

Introduction

Tonkin & Taylor Ltd (T+T) was engaged by ACG Properties Limited to provide geotechnical and natural hazard advice for the proposed visitor accommodation development at 4663 State Highway 6 (SH6), Te Miko, Punakaiki, in support of resource consent application RC240079 to Buller District Council (BDC).

This letter has been prepared following a query from BDC regarding whether T+T's natural hazard assessment work addresses the relevant requirements of the National Policy Statement for Natural Hazards 2025 (NPS-NH)¹. This letter sets out our opinion on that question to assist the application as it proceeds to hearing. It should be read together with:

- Perpendicular Point Natural Hazard Desktop Assessment Version 2, March 2025 (the Desktop Assessment).
- T+T's Geotechnical responses to the Section 92 request for further information, dated 20 November 2025 (the RFI Responses).

Background

The Desktop Assessment identified four natural hazard areas affecting the site, relating to falling debris, gully (debris flow and flooding), cliff erosion, and undermined cliffs. It assigned a qualitative risk level to each geotechnical consideration using a likelihood–consequence risk matrix (based on the Australian Geomechanics Society 2007 framework²). It also provided concept-level management measures and general geotechnical development advice for each hazard.

The RFI Responses confirmed that the development layout has been planned to avoid the identified hazard areas where practicable, and that residual hazards affecting buildings and access can be managed through site-specific investigation, engineered design and construction observation at the detailed design stage.

¹ National Policy Statement for Natural Hazards 2025, Ministry for the Environment. Available at:
<https://environment.govt.nz/acts-and-regulations/legislation/nps-nh/>

² Australian Geomechanics Society (2007). Guideline for Landslide Susceptibility, Hazard and Risk Zoning for Land Use Planning, and Practice Note Guidelines for Landslide Risk Management. Australian Geomechanics, Vol. 42, No. 1.

Three volunteered consent conditions have been offered to give effect to this approach. In summary, these require:

- 1 Buildings to be located outside the cliff erosion, undermined cliff and falling debris hazard areas delineated in the Desktop Assessment.
- 2 Buildings, earthworks and drainage to be designed and constructed so as not to materially increase natural hazard risk on the site or adjacent properties, including during construction.
- 3 A site-specific geotechnical assessment to be prepared by a suitably qualified and experienced geotechnical engineer for each proposed building location prior to any building consent application, confirming the suitability of the location and identifying any foundation, earthworks, retaining, drainage or other mitigation measures necessary as appropriate for development, having regard to the recommendations of the Desktop Assessment.

The NPS-NH was notified on 18 December 2025 and came into force on 15 January 2026. While this is after the Desktop Assessment and RFI Responses were prepared, the NPS-NH is still relevant to BDC's current determination of the application. However, the principles embodied in the NPS-NH were already well understood when our original work was undertaken, so were already addressed in our previous assessment.

NPS-NH context

The NPS-NH provides national direction for managing natural hazard risk to people and property associated with subdivision, use and development. It applies to flooding, landslips, coastal erosion, coastal inundation, active faults, liquefaction and tsunamis. Its objective is that natural hazard risk is managed using a risk-based, proportionate approach. This is given effect through six policies and the implementation provisions in Part 3, which require risk to be assessed using the risk matrix in Appendix 1 (likelihood and consequence tables) and then managed proportionately to the assessed level of risk.

Of the hazards listed in the NPS-NH, those relevant to the proposed development are landslip (falling debris and gully debris flows) and coastal erosion (cliff erosion and undermined cliffs). Coastal inundation and tsunamis are not material to the proposed building platforms, which are located on elevated terraces tens of metres above sea level. Gully flooding and debris flow, while assigned a Very high risk level before mitigation, are not material to the final building platforms provided those platforms are located outside the gully floors and flow paths, consistent with the avoidance approach and Volunteered Condition 1. Active fault rupture and liquefaction were also not identified as significant hazards for the proposed development given the site's elevated, rock-dominated clifftop setting.

Review of alignment with the NPS-NH

Table 1 sets out, for each relevant provision of the NPS-NH, how the natural hazard assessment work undertaken for the proposed development addresses it.

Table 1: Alignment of the March 2025 Desktop Assessment with the NPS-NH 2025

NPS-NH 2025 provision	Summary of how the 2025 Desktop Assessment addresses this provision
Objective 1 – risk-based, proportionate management of natural hazard risk	• The Desktop Assessment assesses each identified hazard using a likelihood–consequence risk matrix (Sheets 5 to 7). • The proposed development layout avoids hazard areas where practicable and manages residual hazards proportionately through design-stage engineering. This reflects the risk-based, proportionate approach at the core of the NPS-NH.
Policy 1 and clause 3.2 – assess risk using the risk matrix	• Risk was assessed using a qualitative likelihood–consequence risk matrix (AGS 2007). This adopts the same risk-based structure and intent as the NPS-NH Appendix 1 matrix, where risk is derived from the likelihood and consequence of a hazard event and expressed as a banded risk level, and the consequence scales are closely comparable. • The Desktop Assessment ratings are pre-mitigation ('without management measures'). Once the avoidance layout and management measures are applied, the residual risk to the proposed development is reduced accordingly.
Policy 2 and clause 3.3 – proportionate management	• Hazard areas are avoided where practicable. • Where development must occur in or near a hazard area for practical reasons, mitigation measures (foundation design, drainage, setbacks and construction sequencing) are scaled to the level of risk and will be confirmed at detailed design.
Policy 3 – very high risk must be avoided	• The development has been specifically laid out to avoid the highest-rated (very high) hazards, such as earthquake-triggered falling debris. • Volunteered Condition 1 requires all buildings to be located outside the cliff erosion, undermined cliff and falling debris hazard areas, so that very high risk from those hazards is avoided. While visitors on the access road will briefly pass through the falling debris hazard zone, this is less exposed to the debris hazard than the main highway they would otherwise be driving along. • In relation to the gully hazard, no buildings will be located within the gully debris-flow / flooding flow paths or gully-floor inundation areas, so that the Very high debris-flow and flooding risk is avoided. • Where cabins remain within the broader mapped gully hazard areas (for example near the gully crest), the residual hazard at those building locations is local slope instability rather than the debris-flow / flooding component. Assessed using the NPS-NH matrix, that residual local slope instability is of a lower risk level and will be accommodated in the design at the relevant building locations through the site-specific geotechnical assessment required by Volunteered Condition 3.
Policy 4 – do not create or increase significant risk on other sites	• Volunteered Condition 2 requires buildings, earthworks and drainage to be designed and constructed so as not to materially increase natural hazard risk on the site or adjacent properties, including during construction.
Policy 5 and clause 3.4 – use best available information, even if uncertain	• The assessment uses the best information available. This includes site-specific hazard delineation from desktop study, LiDAR datasets, and aerial imagery review, which is more precise at site scale than the regional planning overlays. The assessment approach appropriately stages detailed, intrusive investigation to the design phase, consistent with the proportionate-information provision (NPS-NH clause 3.3).
Policy 6 – consider climate change to at least 100 years	• Considered, principally through the effect of sea-level rise on coastal cliff erosion – see commentary below.

Climate change (NPS-NH Policy 6)

The potential effects of climate change over at least the next 100 years have been considered, principally through the influence of sea-level rise on coastal cliff erosion. We note that:

- The proposed building platforms are elevated tens of metres above present sea level.
- Review of aerial imagery from 1950 to 2025 shows limited evidence of coastal erosion at the site over that period.
- All buildings are to be located outside the T+T-mapped cliff erosion and undermined cliff hazard areas.

On this basis, we consider the adopted hazard areas and the avoidance approach provide sufficient allowance for any increase in coastal erosion that may result from sea-level rise over the next 100 years. Sea-level rise may increase the rate at which block 'drop-out' and topple failures occur at the cliff face. This is accommodated by the setback of buildings from the cliff erosion hazard area and can be reviewed at the detailed design stage.

Conclusion

The natural hazard assessment work undertaken for the proposed development, comprising the Desktop Assessment and the RFI Responses together with the volunteered consent conditions, adopts a risk-based, proportionate approach. The outcomes of the assessment align with the objective, policies and implementation provisions of the NPS-NH 2025 for the natural hazards relevant to the site.

In particular:

- Risk has been assessed using a likelihood–consequence risk matrix.
- Very high risk is avoided through the development layout and Condition 1.
- The creation or increase of a significant risk on other sites is addressed through Condition 2.
- Decisions have been based on the best available information, with detailed assessment appropriately staged to detailed design.
- The effects of climate change to at least 100 years have been considered.

Applicability

This report has been prepared for the exclusive use of our client ACG Properties Limited, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

We understand and agree that our client will submit this report as part of an application for resource consent and that Buller District Council as the consenting authority will use this report for the purpose of assessing that application.

Tonkin & Taylor Ltd

Environmental and Engineering Consultants

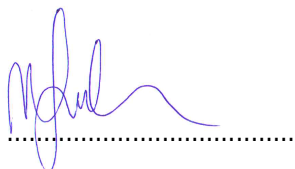
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