



TOWNPLANNING GROUP

Our Ref: 3178-24

17 June 2026

Jess Hollis
Consultant Planner
Buller District Council

VIA EMAIL: jessica@hollisplanning.co.nz

Dear Jess,

RESPONSE TO FURTHER INFORMATION REQUEST – RC240079 – 4663 STATE HIGHWAY 6, TE MIKO, PUNAKAIKI

This letter responds to your email dated 24 May 2026 requesting further information and clarification (**RFI**) in relation to the Punakaiki Wild resource consent application (Buller District Council (**BDC**) reference RC240079). Given the focused nature of the matters raised, responses to each of the requests for further information are provided in **Table 1** below. This response is supported by the following additional information:

SUPPORTING ATTACHMENTS:	
SHAREPOINT LINK: PUNAKAIKI WILD - RFI 3 RESPONSE AND SUPPORTING DOCUMENTS	
[A]	Updated Landscape Earthworks Plan (17 June 2026)
[B]	Updated Earthworks Schedule (17 June 2026)
[C]	TTPP Natural Hazard Overlay Plan
[D]	T+T Assessment against the National Policy Statement for Natural Hazards
[E]	Updated Site Masterplan (15 June 2026)
[F]	Updated Vegetation Management Plan (15 June 2026)
[G]	Email Correspondence with Fire and Emergency NZ
[H]	RMA Ecology Memorandum regarding Ecology Conditions (5 June 2026)
[I]	Carriageway Consulting Email regarding Equivalent Vehicle Movements
[J]	Building Area Assessment

Offices in Queenstown and Christchurch

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We trust the above information adequately addresses the matters raised in your request for further information. Should any further clarification be required, please do not hesitate to contact the undersigned.

Your sincerely

Town Planning Group

A handwritten signature in blue ink, appearing to read 'Daniel Thorne', with a stylized, cursive script.

Daniel Thorne

Director



TABLE 1: FURTHER INFORMATION RESPONSE [dated 17 June 2026]

FURTHER INFORMATION ITEMS REQUESTED		RESPONSE
Project Update / Updated Information		
1	<i>Provide an updated landscape earthworks plan to address the following:</i> <i>a. The previous landscape earthworks plan (dated 28/05/2025 - no revision reference) included a earthworks summary on the second page. Please provide a similar summary/calculations for the revised landscape earthworks plan (Attachment C)</i> <i>b. The landscape earthworks plan (Attachment C) shows earthworks extending onto Part Section 2 Block IX Brighton SD (Paparoa National Park) on the opposite side of State Highway 6, however the T&T geotechnical response (Attachment O) notes there are no upslope works required. I understand from our discussions that no works/earthworks are proposed on the upslope side of State Highway 6, therefore please provide an updated/accurate landscape earthworks plan to reflect this.</i>	Refer updated Landscape Earthworks Plan and associated Schedule enclosed as Attachment [A] and [B], with this recording the updated estimate of proposed earthworks (involving approximately 1736m³ of cut and 3314m³ of fill). We confirm that based on the current access design, there are no works proposed on the upslope side of SH6, with this reflected in the Landscape Earthworks Plan.
2	<i>The Natural Hazards Assessment (Version 3, 24 March 2025) only shows the proposed TTPP coastal hazards variation setback and there is no plan available showing the proposed buildings in relation to the Coastal Inundation 2 Hazard Overlay under the TTPP Decisions Version (TTPP DV). Please provide a plan clearly showing this to confirm the extent of buildings that require consent under NH-R30 of the TTPP DV.</i>	Refer TTPP Natural Hazard Overlay Plan (prepared by RMM Landscape Architects) enclosed as Attachment [C], with this confirming that a portion of the lodge and single cabin SC8 are partially located within the Coastal Inundation 2 Hazard Overlay. In addition to this, and as per our recent discussions, please find enclosed as Attachment [D] a letter from T+T confirming their assessment against the National Policy Statement for Natural Hazards.
3	<i>Provide an updated site masterplan to address the following:</i> <i>a. clearly show the boundary setbacks of the new lodge buildings (setbacks indicated are for previous lodge design)</i> <i>b. the updated ecological report (Attachment G) contains a different version of the site master plan on page 36 (shown as Figure 8). This plan has different numbering of the single cabins to the site masterplan provided (Attachment A). Please consider updating the</i>	Refer updated Site Master Plan and Vegetation Management Plan enclosed as Attachment [E] and [F] respectively, with this recording consistent single cabin numbering (SC1-SC8), with the boundary setbacks identified.

FURTHER INFORMATION ITEMS REQUESTED		RESPONSE
	<i>single cabin numbering on the site masterplan so that they align with the references in the ecological assessment (to avoid confusion). (It is acknowledged that you may also want to consider if this impacts other references used in other technical reports).</i>	
Fire Fighting Water Supply		
4	<i>Provide a copy of any correspondence with Fire and Emergency New Zealand confirming the approach to fire-fighting water supply conditions is supported.</i>	Refer email correspondence enclosed as Attachment [G] from Jordan Lineham of Fire and Emergency, with this confirming their support for the proposed firefighting water supply approach and associated consent condition.
Ecology		
5	<i>It is noted the example conditions provided in Appendix A to the RMA Ecology letter dated 12 April 2026 (Attachment K) require adherence to the Australian Government's National Light Pollution Guidelines (rather than just taking into account/considering them). Please provide further comment from Emily Roper of RMA Ecology whether it is her opinion that Condition 10 of the 'Volunteered Conditions of Consent' (Attachment I) meets her 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".</i>	Refer RMA Ecology Memo enclosed as Attachment [H] , with this confirming the Lighting Management Plan condition meets their requirements with respect to their conclusion that adverse effects on coastal birds are negligible.
6	<i>The original ecology report and application referred to "consent is sought out of caution for indigenous vegetation clearance of approximately 50m2 where there may be pockets of indigenous vegetation within gorse. This will be limited to the areas of access tracks and building platforms and will exclude areas identified as potentially significant vegetation". The updated ecology report (Attachment G) appears to increase this amount (detailed on page 38), however the TTPP DV rule assessment (Attachment S) stills refers to approx. 50m2. Please confirm the correct figure(s) of indigenous vegetation clearance (acknowledging it appears to be under the 500m2 threshold in the TTPP DV regardless).</i>	The correct figure for indigenous vegetation clearance is that identified in Section 5.4 of the updated Ecology Report (dated 12 April 2026), which estimates that up to 394m² of indigenous vegetation may be affected. This estimate is based on the mapped extent of native shrubland and mixed native-exotic scrub within the proposed works area. It should be noted that this figure represents a conservative, risk-based estimate and assumes that some indigenous vegetation may occur within the works footprint, notwithstanding the design intent to avoid indigenous vegetation clearance wherever practicable. In any event, and as acknowledged, the estimated extent of indigenous vegetation clearance remains compliant with ECO-R1 of the TTPP.

FURTHER INFORMATION ITEMS REQUESTED		RESPONSE
7	<i>Clearly describe/provide cross references to the volunteered consent conditions (Attachment I) that align with the consent condition references in Section 7.0 of the updated ecology report (Attachment G</i>	Refer RMA Ecology Memo enclosed as Attachment [H] , with this providing a cross reference between the volunteered conditions and their recommendations.
Access and Traffic Generation		
8	<i>Confirm whether the maximum traffic generation on the site, calculated at 88 vehicles per day in the Transportation Assessment (Attachment M), includes an allowance/calculation for equivalent car movements for commercial heavy vehicle movements (as applicable) under Table TRN-7 of TTPP DV.</i>	Refer to the email correspondence from Andy Carr of Carriageway Consulting enclosed as Attachment [I] , which confirms the calculations around traffic generation and 'equivalent car movements' as defined under Table TRN-7 of the TTPP.
Historic Heritage		
9	<i>Appendix 1 is missing from the archaeology assessment (Attachment P). Confirm it is the same document as provided in Attachment Q.</i>	Yes, this is confirmed.
Assessment against relevant plans		
10	<i>The RFI response letter notes that "Notwithstanding the above, it is noted that under the TTPP the proposed water tanks would be defined as minor structures, and considered under GRUZ-R5. While a permitted activity pathway exists, their location within 20m of State Highway 6 means they would fall to be assessed as a controlled activity under GRUZ-R15." GRUZ-R15 requires compliance with all other performance standards of GRUZ-R1, including buildings and structures being set back a minimum of 20m from the State Highway boundary. Would the proposed water tanks, where located within the 20m setback therefore be a Discretionary Activity under GRUZ-R27? Further, will the setbacks required under the BDP be achieved for the water tanks</i>	The water supply infrastructure (including firefighting water supply arrangements) remains subject to detailed engineering design, as recognised in the volunteered conditions. However, at this stage it is anticipated that one or more water tanks may be located in proximity to the State Highway boundary as part of the final water supply and firefighting water supply solution. Based on the current concept design, it is anticipated that any water tanks would be located at least 10m from the State Highway boundary. While this would comply with the 10m front yard setback standard under the Buller District Plan, it would not achieve the 20m setback required under GRUZ-R15 (by way of reference to GRUZ-R1). As a consequence, the water tanks would be considered as a discretionary activity under GRUZ-R27. Notwithstanding this non-compliance, the proposed setback is consistent with the setback required under the Buller District Plan and, given the limited scale of the tanks, recessive finishes, and proposed planting and/or landform screening, any resulting effects are anticipated to be insignificant.

FURTHER INFORMATION ITEMS REQUESTED		RESPONSE
11	<i>Taking into account the amendments to the lodge design and cabin reductions, provide an updated ground floor area assessment/figures (for consideration of the BDP Paparoa Character Area standards).</i>	Refer to the Building Area Assessment enclosed as Attachment [J] . By way of summary, the total building floor area across the approximate 22ha site is 1,703m ² (including existing and proposed buildings, and additional provision for 150m ² of water tank footprint as identified below).
12	<i>Consider whether any proposed water tanks and treatment plant, for both potable and fire-fighting supply, will need to be considered under the ground floor area calculations (if they meet the definition of building - greater than 10m² in area or higher than 2m) under the BDP. If they may require consent then this should be included within the scope of the current application, including in ground floor area calculations, and some parameters provided. For example, up to Xm² of ground floor area to provide for water tanks, likely to be located X and X (if possible), but will be subject to final design.</i>	The water supply infrastructure (including firefighting water supply arrangements) remains subject to detailed engineering design, as recognised in the volunteered conditions. In light of this uncertainty and recent discussions with Fire and Emergency New Zealand, we propose that a flexible and adaptive approach be adopted in respect of water supply and tank infrastructure across the site. This could involve the adoption of a consent condition that provides for water tanks to be located at positions determined through detailed design, subject to specified performance standards and mitigation measures unless otherwise agreed in writing by BDC, including: • The total cumulative footprint of water tank infrastructure across the site shall not exceed 150m²; • Individual water tanks shall not exceed 3.5m in height above ground level and shall have a maximum diameter of 5.0m. We consider that these parameters provide sufficient certainty regarding the scale and potential effects of water tank infrastructure, while retaining flexibility to accommodate the final engineering design and any agreed firefighting water supply solution. The above provisions could be incorporated into Volunteered Condition 3 (which already requires tanks to be finished in recessive colours and screened by planting and/or partially buried) or alternatively within the detailed water supply engineering condition contained within Volunteered Condition 2. We welcome BDC's feedback on this proposed approach.
13	<i>Confirm that no signage is proposed/consent sought.</i>	As per the RFI response dated 29 April 2025, no signage is proposed as part of the present application.