

RC14513 / Glen Isla Reserve Coastal Protection – Summary Statement of Will Gumbley (Landscape and Visual Effects)

This summary provides an overview of key matters relating to landscape and visual effects and responds to new information presented in the statement of evidence by the applicant’s landscape expert, Mr Coombs, dated 25 July 2025, as well as the Glen Isla Protection Society’s Proposed Consent Conditions.

Key Matters

Appraisal of Landscape and Visual Effects

- 1. My review of the Landscape and Visual Assessment and Section 92 responses raised concerns about the overly positive commentary of the proposal. Considering the short term and long term effects, and the proposal’s potential to prevent future erosion and vegetation loss, it is my opinion the overall effects are more neutral.
- 2. The conclusions drawn from the evidence of Mr Coombs, as well as from my own appraisal, rely heavily on the successful restoration of native dune vegetation. I will address the effectiveness of this restoration, along with the limitations of the proposed consent conditions, later in this statement.
- 3. A comparison of the effects ratings provided by Mr Coombs and my own appraisal is presented in the following table:

Effect	Original Assessment Rating (Applicant)	Reappraisal Rating (Reviewer)
Natural Character	Moderate-High positive	Neutral
Landscape Character	High positive	Neutral
Visual Amenity	Waihi Beach: Moderate-High positive Three Mile Creek Reserve (north of the site): Neutral	Low positive
Construction (temporary)	Low adverse	Low adverse

Public Access

- 4. Mr Coombs attributes the opportunity for future public access between the sea wall and beachfront properties as a **high positive** landscape effect. However, a future accessway is not part of this application and cannot be relied upon in the assessment of landscape effects, for the following reasons:
 - a. Council has no plans to implement an accessway;
 - b. Its formation may require separate consenting due to earthworks and the clearing of indigenous vegetation;

- c. Clearing native vegetation would contradict the positive effects relied upon in the landscape assessment;
- d. Some GIPS residents may oppose an accessway running close to their property.

Sea Wall Location

- 5. The Coastal Engineering Review attached to the Section 42A Report recommends that the rock structure could be located further landward. This would delay its exposure, reduce impacts on coastal processes, allow dunes and sand to recover naturally from storm events for longer, and reduce ‘end effects’ at the southern end.
- 6. Mr Coombs supports the current 5 metre setback, citing the retention of planting behind the wall and the opportunity for future public access. He also proposes an in-between option—ranging from a 5 metre offset at the south end to a reduced offset of 1.5 metres—considering this as acceptable from a landscape, natural character, and visual effects perspective.
- 7. As previously discussed, I consider the opportunity for public access cannot be included in this assessment.
- 8. In my opinion the difference in effects between the current 5 metre setback and a location closer to the properties is minimal. While the 5 metre setback allows more space for native vegetation restoration, the benefits of a more landward wall location—as outlined in the Coastal Engineering Review—are equally relevant. A 1.5 metre setback does provide a small visual amenity benefit through a planted buffer between the wall and property boundaries.

Proposed Consent Conditions

- 9. Mr Coombs’ positive effects ratings, and my own appraisal, rely on the successful establishment and long-term maintenance of indigenous dune planting, as illustrated in the visual simulation in LVA Appendix C, Part 4. However, the limitations of the proposed conditions reduce the likelihood of achieving this outcome before vesting with Council. The proposed consent conditions of particular concern are:
 - a. **Condition 39**, which allows for maintenance of remedial planting only where damage results from no more than two storm events during the Maintenance Period.

And;

 - b. **Condition 43(d)**, which defines the Maintenance Period as the earlier of either:
 - i. The date two years after the completion of planting; or
 - ii. In the opinion of the suitably qualified and experienced ecologist, the date the Reinstatement Area achieves 80% coverage of indigenous species.
- 10. Ecologist Willie Shaw advises that Spinifex requires a minimum of two years to begin establishing. Therefore, achieving 80% coverage within the two-year Maintenance Period is unlikely. If storm damage, rabbit browsing, or vandalism occurs, replanting would be required—further delaying establishment and making the 80% target even less achievable.

- 11. Given the challenging environment for restoration planting, the limitations of the proposed consent conditions, and the reliance of Mr Coombs' evidence and my own appraisal on the successful establishment and long-term maintenance of native dune restoration planting, I recommend implementing a Sand and Vegetation Management Plan in accordance with the Wildlands Review of Ecological Effects.
- 12. Mr Coombs disagrees with my recommendation for a Sand and Vegetation Management Plan, citing that natural sand accretion is expected. However, this statement does not address the vegetation management aspect or the implications that a lack of vegetation management may have on achieving the performance target of 80% *Spinifex* cover over the foredune within the proposed two-year Maintenance Period.

Conclusion

- 13. When considering the potential effects over time—and assuming successful implementation of dune revegetation—I am of the opinion that the proposal will not result in landscape and visual amenity effects that are more adverse than if no coastal protection structure were implemented and the site were left to ongoing storm damage.
- 14. This conclusion relies on the adoption of the following changes to the consent conditions, as previously outlined:
 - a. A requirement to achieve a performance target of 80% established Spinifex cover to the foredune prior to the transfer of maintenance responsibilities to Council.
 - b. Removal of the two-year cap on the Maintenance Period.
 - c. Removal of the limitation on replacement planting following no more than two storm events.