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15 July 2025

Attention: Bevan Hudson

Dear Bevan

Glen Isla Reserve Coastal Protection Structure
Landscape and Visual Effects – Peer Review Summary and Expert Re-Evaluation

Introduction

This document provides a summary of findings from the original review of the *Assessment of Landscape and Visual Effects* (the Assessment) for the Glen Isla Reserve Coastal Protection Structure (the Proposal), as well as the initial Section 92 request for further information (S92).

Following this summary are responses to the second S92 request, a re-evaluation of the Proposal’s effects on natural character, landscape character, and visual amenity, and corresponding mitigation recommendations.

For reference, the original peer review report—comprising a comprehensive review of the Assessment, responses to the initial S92, and comments on public submissions—is appended to this document.

Peer Review Summary

The peer review of the original Assessment and initial Section 92 responses identified several key themes and areas requiring clarification or further analysis. The following points summarise the main findings:

- **Associative Landscape Values:** The Assessment did not address associative attributes contributing to landscape values, resulting in an incomplete evaluation of landscape character¹.

¹ Based on the tripartite approach of the NZILA Te Tangi a te Manu Landscape Assessment Guidelines, for analysing and defining landscape values.



- **Sand Crest Protection:** A sand crest at the northwest end of the seawall was confirmed to remain outside the construction footprint. However, the absence of fencing raises questions about potential disturbance during construction.
- **Statutory Context:** While planning matters were summarised, the Assessment lacked analysis of how the proposal aligns with specific statutory provisions.
- **Viewing Audience:** Initial assumptions that only Glen Isla Place dwellings would have private views were corrected. Dwellings north of Three Mile Creek may have limited views, but these are considered minor and acceptable.
- **Natural Character:** Positive effects at project completion are assumed, based on successful vegetation establishment. However, this may take time due to environmental conditions, and no effects rating is provided for scenarios where the structure becomes exposed.
- **Public Access:** A high positive rating is given based on the potential to maintain future public access. As no access route is currently planned, this assessment is speculative.
- **Outstanding Natural Feature (ONF):** The Assessment states there will be no adverse effects on the S24 Open Coastal Landward Edge Protection Yard overlay (S24), but does not reference specific values or characteristics, making the conclusion difficult to verify.
- **Visual Amenity:** Rated as moderate–high positive, based on assumptions about future erosion and recovery. The Assessment lacks detail on these assumptions and does not consider varying visual impacts over time.
- **Cumulative Effects:** The response states cumulative effects are not adverse but does not address whether increasing rock walls could exceed the landscape’s capacity for change.
- **Mitigation Measures:** Recommendations for planting and dune restoration are appropriate and supported.

In summary, the peer review found that several conclusions in the Assessment appeared overly optimistic and lacked sufficient detail or justification for the assumptions underpinning them. In turn these “positive effects” have been referred to in the Assessment of Environmental Effects (AEE). The peer review identified areas requiring further work to support the Assessment’s findings and recommended a review of the effects ratings and the implications of these ratings have on corresponding thresholds of effects-based terminology under the Resource Management Act (RMA).

A summary of effects ratings from the Assessment are as follows:

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

Section 92 Request for Further Information

On 25 March 2025, a second S92 request was issued to the Applicant. Following this, a meeting was held on 9 April 2025 with representatives from the Council, the Applicant's planner and landscape architect, and GPS to discuss the matters raised. Subsequently, the Applicant's landscape architect submitted a second response, dated 15 May 2025.

The landscape and visual-related questions, and review of the Applicant's responses is provided below.

1. S92 request:

Update the LVA to include a description and assessment of effects on associative values. Additionally, provide an assessment of effects on landscape values derived from the interplay of physical, associative, and perceptual dimensions, as outlined in paragraphs 6.19 and 8.07 of Te Tangi a te Manu.

- Review of Applicant's response (page 3, para. 6 - 11):**

The expanded description of Waihi Beach's associative values is relatively broad and high-level. However, this is considered adequate, as there are no clearly identifiable site-specific associative values that differ significantly from those found across the broader Waihi Beach area. This level of detail is also appropriate given the nature and scale of the Proposal.

2. S92 request:

Detail your understanding of the specific characteristics and values of District Plan Outstanding Landscape Feature S24 to justify the conclusion that the proposal will avoid adverse effects on the characteristics contributing to the values of this overlay.

- Review of Applicant's response (page 5, para. 12 – 18):**

The response expands on the general location and nature of the S24 overlay and the open beach and coastal characteristics that are central to its value are briefly mentioned, and emphasis is placed on the existing coastal protection structures that exist within the overlay.

The claim that the Proposal will not affect S24 overlay values is overly simplistic. Some level of adverse effect on natural character values—likely to be at the lower end of the scale—is anticipated, particularly as the structure becomes more exposed over time. The suggestion that existing structures do not impact the overlay's values is difficult to fully support, as such features clearly reduce the extent and integrity of the natural coastal character the overlay is intended to protect.

No updated landscape effects rating is provided, and the continued classification of the landscape character effects as High Positive is assumed. This effects rating does not reflect the potential for low level adverse effects or cumulative adverse effects.

3. S92 request:

The landscape effects related to potential public access are assessed as "high positive" based on the proposal's protection of public land that could potentially be used for public access in the future. However, this scenario of public access is speculative, as there are no current plans to implement such an access route. Additionally, creating such access would require further disturbance of dunes, which conflicts with the LVA's conclusions and scale of effects on Natural Character. Provide further justification for the validity of this public access scenario, considering the likelihood of it happening and the implications in terms of landscape and visual effects or other consenting issues. Alternatively, remove it from the assessment and review the conclusions and scale of effects in light of this omission.

- Review of Applicant's response (page 6, para. 19 – 20):**

The response provides further rationale for the structure's placement and the potential for a future access track, noting it could resemble informal, foot-worn paths seen elsewhere.

The prospect of future access does offer a potential benefit; however, the risk of disturbing dune vegetation—relied upon in the natural character assessment—diminishes its value. The access scenario remains speculative, with no certainty around Council implementation or community support, including from Glen Isla Place residents. As such, it should not be treated as a confirmed positive outcome or used to justify a “high positive” landscape character rating. It would be more appropriate to describe this as an opportunity that may or may not be realised, and which should carry limited weight in determining the overall effects rating.

4. S92 request:

The visual amenity effects are rated as “moderate-high positive” compared to a “likely edge” from future climate change impacts. However, the assessment lacks details on the anticipated “likely edge,” including the recovery timeline through natural sand movement, manual replenishment, or dune planting. The comparison between the proposal and an eroded coastal edge versus a restored one should account for varying effects. Provide further detail and assumptions regarding the anticipated “likely edge” condition, including consideration of effects across the construction, medium, and long-term timeframes from when an erosion event occurs, through its recovery.

- **Review of Applicant’s response (page 7, para. 21 – 27):**

The response expands on assumptions regarding the future “likely edge,” referencing past storm events and the resulting exposure of historic coastal protection structures, along with associated adverse effects on visual amenity. Although the “moderate–high positive” effects rating still appears somewhat optimistic—particularly given the anticipated increasing exposure of the proposed structure—the rationale of providing a buried structure with dune planting in the short term, and retention of dune vegetation behind the wall in the long term, supports the conclusion that some positive effects are likely.

5. S92 request:

The assessment of natural character effects emphasises the historical modification of the dune landform due to past erosion protection works. While this context is relevant, on-site observations indicate that this area does not appear to be entirely modified. Coastal engineers have identified that the dune, in its current state, is recovering with vegetation cover. Update the assessment of natural character effects over the construction, medium, and long term, taking into account the current recovering condition. In the updated assessment, compare this with the alternative scenario where the proposal is not implemented. Consider the recovery measures that can reasonably be expected to be implemented in response to future erosion events, as described in 4. above, including natural sand movement, manual sand replenishment, and dune planting. Additionally, consider District Plan Rule 6.6.1.3 regarding the anticipated loss of dune landform and vegetation within Outstanding Landscape Feature S24 as a result of the proposal.

- **Review of Applicant’s response (page 10, para. 28 – 31):**

The response highlights the extent of existing modifications along the coastal edge and the presence of coastal protection structures. The statement in para. 23 regarding the potential exposure of relic protection works during future storm events is relevant in the context of justifying possible positive effects of the proposal.

However, the response does not provide updated natural character effects ratings, and it is therefore assumed that the assessment maintains its position of a “Moderate-High Positive” rating. This rating does not appear to give sufficient weight to the existing natural values of the site, the potential impact of a proposed access track (as speculated in the assessment of landscape character effects), and relies on the successful restoration of native dune vegetation. The effectiveness of restoration planting is addressed in the recommendations section below.

6. S92 request:

In relation to comments made on cumulative effects, provide additional commentary on whether the increase in rock walls proposed will contribute to reaching a tipping point in the landscape’s capacity to accommodate change along this stretch of coastline, as outlined in paragraph 6.48 of Te Tangi a te Manu.

- **Review of Applicant’s response (page 11, para. 32 – 34):**

Additional commentary is provided, expanding on the prevalence of coastal protection structures along the surrounding coastline. It describes the relatively subtle nature of the Proposal, noting that it will be buried and, when exposed, the wall will not be visible in its entirety. This is used to justify the conclusion that cumulative effects will be limited.

While it is reasonable to conclude that the Proposal is unlikely to contribute to reaching a tipping point in the landscape’s capacity to accommodate change, the response does not acknowledge that it will still contribute a degree of cumulative effect—even if that contribution is likely to be very limited. A specific cumulative effects rating is not provided.

7. S92 request:

The recommendation to use rock of “various sizes” for the rock revetment may not meet engineering requirements. Since the LVA effects ratings assume this, please confirm if varying rock sizes will be used. If not, remove this recommendation and update the LVA conclusions and effect scale.

- **Review of Applicant’s response (page 12, para. 35):**

The response acknowledges that engineering requirements for rock size and format will prevail. However, the effects ratings and conclusions in the Assessment do not appear to rely heavily on the recommendation to use rock with “a variety of sizes selected to ensure a more naturalistic appearance to the revetment”.

8. S92 request:

Update the design drawings to show that the sand crest at the north end of the seawall is retained and fenced off with temporary fencing, consistent with other protected dune vegetation areas on the drawings. This will clearly indicate that this area of dune vegetation is to be protected during the works. Additionally, provide confirmation on when it will be appropriate to remove this temporary fencing.

- **Review of Applicant’s response (page 13, para. 36 – 37):**

It is clear in the written response that the intention is to retain and protect the sand crest, and it is noted that such a fence could be installed during the construction phase. The sand crest fence alignment has not appeared on any of the plans seen to date.

Re-Evaluation of the Proposal

Having visited the application site and the wider Waihi Beach setting, a re-evaluation is provided, following the same structure and headings as the original Assessment for ease of comparison.

Some issues raised in the review of the original Assessment have been addressed through the Section 92 request for further information. However, there remain areas where our interpretation differs from that of the original Assessment, as outlined above. As such, the nature and degree of effects have been further described to clarify the reasoning for these differing perspectives. An assessment is presented below, maintaining the original assessment headings for consistency and ease of reference.

Existing Environment

The original Assessment placed emphasis on the modified nature of the site and surrounding coastline, portraying the environment as heavily altered. While natural features were acknowledged, greater emphasis should be placed on the landscape values that contribute to the distinctive character of Waihi Beach, and the site—values that are appreciated by both residents and visitors. These include:

- Dynamic coastal processes and natural beach patterns between the sandy beach and the natural shoreline.

- Planted dunes and coastal vegetation, including native dune flora and fauna, provide a naturalised buffer between the beach and adjacent residential properties, while also helping to break up the extent of modified and reinforced coastal edges.
- Recreational values for beach users, supported by the wide, open beach environment—particularly at low tide—as well as opportunities for water-based activities.
- Experiential aspects of the beach environment, including the constantly changing coastal patterns and processes throughout the day, such as tides, winds, sounds, and smells.

Natural Character

The site is not located within an area of outstanding natural character, and the Assessment has not identified any significant adverse natural character effects—a position that is accepted. In the short term, the proposal may result in an improved natural character condition, particularly during the period when the rock revetment is buried and dune planting is successfully established. However, this positive outcome is heavily dependent on the effective implementation and maintenance of the dune restoration, which is discussed in further detail below, in the Recommendations section of this report.

In the long term, once the revetment becomes exposed, the argument that it will protect the dune vegetation landward of the structure is valid. While the exposed revetment does not contribute positively to natural character, its presence—when compared to the likely scenario of continued erosion and loss of dune landform and vegetation (as evidenced by past storm events)—can be considered a neutral outcome in terms of natural character effects i.e. it avoids a negative outcome for the landscape features through the protection function.

That said, the long-term presence of the structure will ultimately inhibit the natural, dynamic processes of dune formation and change. Accordingly, the conclusion in the Assessment that the effects will be overtly positive is not fully supported when the long-term implications are considered. The positive outcomes highlighted in the original Assessment primarily relate to the protection of private property, rather than the preservation or enhancement of natural coastal dynamics.

On balance, the natural character effects rating is assessed as **neutral**.

Landscape Character

This re-evaluation assesses landscape character effects in accordance with the physical, associative, and perceptual values outlined in the NZILA Te Tangi a te Manu Landscape Assessment Guidelines².

The original Assessment noted the broad and generic alignment of the S24 Outstanding Natural Feature overlay, which includes both natural and modified areas, such as urban development and existing coastal protection structures. It concluded that the proposal would not result in adverse effects on the S24 overlay, based on the assumption that additional coastal protection structures are consistent with the already modified context.

This re-evaluation considers that the key values underpinning the S24 overlay are more closely associated with the remaining natural elements of the coastline—particularly the beach environment, dune systems, and native vegetation that exist between urbanised areas and the open beach.

² 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

In this context, while the surrounding urban environment, modified coastal edge, limited native vegetation, and prevalence of weed species reduce the landscape's sensitivity to change, the proposal still introduces a new built structure into the coastal landscape. In the short term, the buried structure and proposed dune restoration planting will enhance the coastal edge. Over time, however, as the structure becomes exposed, these visual and landscape benefits are likely to diminish. The proposal does offer some merit in protecting vegetation behind the structure from future storm erosion, particularly when compared to a scenario where more extensive dune loss could occur.

The potential for the proposal to enable future public access between the structure and beachfront properties has not been considered in this assessment due to the speculative nature of the scenario and the potential for adverse impacts on dune restoration planting.

Although the proposed structure is designed to be less visually intrusive than other coastal protection structures along this coastline—being initially buried and only partially exposed over time—it still represents an incremental increase in the extent of coastal protection along the Waihi Beach coastline. Consequently, the proposal is considered to have a low degree of cumulative adverse effect, due to its impact on natural coastal dynamics and the increased presence of visible seawall structure in the long term.

On balance, the landscape character effects rating is assessed as **neutral**.

Visual Amenity

As noted in the original Section 92 response, the proposal is not expected to impact views from properties north of Three Mile Creek. This is due to a combination of separation distance, viewing angles, and screening provided by existing dune landform and vegetation. This re-evaluation supports that conclusion.

Visual amenity effects will primarily be experienced by beach users and residents of the beachfront properties on Glen Isla Place (the applicants).

The site currently features a recovering dune landform with areas of native dune vegetation. While the presence of beachfront dwellings and the Three Mile Creek groynes is evident, the immediate site retains natural character and does not appear to be heavily modified.

In the short term, the proposal is expected to enhance visual amenity through the integration of a buried structure with dune restoration planting, contributing to a more naturalised coastal edge. However, as the structure becomes increasingly exposed over time, these visual benefits will diminish.

It is acknowledged that significant storm events—such as those experienced historically—can cause major erosion, resulting in the loss of dune landform and vegetation. In such scenarios, the exposure of debris and relic structures may have a greater adverse impact on visual amenity than the partial exposure of the proposed rock structure.

On balance, the visual amenity effects rating is assessed as **low positive**.

Construction (temporary)

Construction activities will involve excavation of the recovering dune landform and removal of dune vegetation, along with temporary disruption to visual amenity due to the presence of earthworks machinery, truck movements, stockpiles of sand and rock, and site fencing. However, the short duration of the works, combined with scheduling outside of the summer months, will help to mitigate these temporary landscape effects.

The temporary landscape effects of the construction phase are assessed as **low adverse**.

Summary

A summary of the effects ratings identified through the re-evaluation process, along with a comparison to the original Assessment, is provided in the table below. For the purposes of this re-evaluation, a “neutral” effects rating indicates that the proposal is assessed as having neither adverse nor positive effects.

Effect	Original Assessment Rating (Applicant)	Re-evaluation 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

Conclusion

The original review and re-evaluation raised concerns that the original Assessment and Section 92 responses have portrayed the Proposal too positively in terms of landscape effects. However, on balance, the application is considered acceptable in terms of natural character, landscape character, and visual amenity. This is due to the overall effects-neutral outcome, where—when weighing the potential effects over time—it is evident that the proposal will not result in effects more adverse than if no coastal protection structure were implemented and the site were left to ongoing storm damage.

Recommendations

The effects ratings and conclusions reached above are dependent on the successful establishment and long-term maintenance of native dune restoration planting. To ensure that dune restoration planting achieves the intended mitigation outcomes, it is recommended that a Sand and Vegetation Management Plan be implemented in accordance with the potential consent condition outlined in the Wildlands Ecological Report³.

Yours sincerely



Will Gumbley

Associate - Landscape Architecture

on behalf of

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³ Updated Review of Ecological Effects and Submissions for a Proposed Seawall at Glen Isla Place, Waihi Beach. Wildlands, July 2025.



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7 March 2025

Attention: Bevan Hudson

Dear Bevan

**Glen Isla Reserve Coastal Protection Structure
Landscape and Visual Assessment Review**

Introduction

Beca Ltd has been engaged by the Western Bay of Plenty District Council (WBOPDC) to review and provide comments on the Assessment of Landscape and Visual Effects report (the Assessment), and a Section 92 request for further information response (S92), for a proposed 200m long rock revetment seawall at Waihi Beach. The Assessment, prepared by Isthmus Group Limited (IGL) and dated 11th October 2024 (Final version), on behalf of the Glen Isla Protection Society (GIPS), has been reviewed in the context of the overall Assessment of Environmental Effects (AEE) lodged with WBOPDC to support a consent application made under the Resource Management Act 1991 (RMA).

This review, conducted in accordance with NZILA Landscape Assessment Guidelines Te Tangi a te Manu¹ (the Guidelines), focuses on the establishment and application of an appropriate methodology and a clear assessment of the actual and potential landscape and visual effects of the seawall. It is not an alternative or parallel assessment.

The review is structured around the key sections of the Assessment, with relevant parts reviewed under its respective heading in the "Review of the Assessment of Landscape and Visual Effects" section below. Specific aspects of the Assessment that require further work to support its findings are summarized in the "Review Findings" section at the end of this report.

Additionally, a review of relevant public submissions received by WBOPDC is provided at the end of this report.

¹ 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.



A site visit was conducted on 30th October 2024 to gain an appreciation of the subject site and surrounding landscape. The visit aimed to better understand the extents and footprint of the proposed sea wall, as well as the access to the site for construction.

Review of the Assessment of Landscape and Visual Effects

Executive Summary

1. A four-page executive summary outlines key factors considered within the assessment. The matters raised in the executive summary are addressed in subsequent sections of this review.

Introduction

2. An introduction to the scope and purpose of the report is clearly outlined, including the focus for the assessment being natural character, landscape and visual amenity effects.

An overview of the location, and the background to the proposal is also provided within the introduction.

Assessment Approach and Methodology

3. The methodology used in the Assessment includes the 7-point effects ratings scale and its relation to effects-based terminology under the RMA, aligning with the Guidelines.
4. Paragraph 3.4 of the Assessment outlines the approach taken to avoid “double counting” of effects. It does this by considering effects on the natural landscape and natural features solely under the heading of **Natural Character**, and not again under **Landscape Character**.

Additionally, the assessment does not consider **associative** landscape values and effects.

The Guidelines describe landscape as an integrated whole, comprising three overlapping dimensions: **physical**, **associative**, and **perceptual**. Assessing landscape without considering associative values, and the interplay of the three overlapping dimensions, is identified as a “potential pitfall” in the Guidelines². This omission results in an insufficient analysis of landscape character.

Further commentary on this issue is provided in paragraph (6) below.

Existing Environment

5. This section provides a brief summary of the landscape attributes and the features expressing the natural character of the immediate site. However, it places more emphasis on describing the **modified attributes** of the landscape and lacks clear identification of the **landscape values** embodied by the physical attributes, which should form the basis for assessing landscape effects.
6. This section focuses primarily on physical landscape character, without fully addressing the landscape values derived from the interplay of **physical**, **associative**, and **perceptual** dimensions. Consequently, the assessment of landscape effects does not consider the impact of the Proposal on associative values, described in the Guidelines as “*intangible things that influence how places are*”

² Para 6.28, page 146, ‘Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines’, Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

perceived,”³ which can include tāngata whenua associations and experiences, shared and recognized community values, and sense of identity.

It is acknowledged in the AEE that while GIPS have extended opportunities to engage with mana whenua, no specific commentary has been provided by mana whenua regarding the proposal and its tangible cultural impacts. Additionally, the project will not be located within any recorded 'Sites of Significance to Māori' as identified in the District Plan.

7. It is noted “*there will be further values at the site associated with the potential for public access (should the Council wish to provide this at some point in the future)*”. This strip of land in question is vegetated, with no pathway, and appears that it is not used by the public, therefore this should not be considered as a landscape value associated with public access.

The Proposal

8. The proposal provides a detailed description of the buried rock revetment, the extent of the structure, and the proposed sand placement and planting in disturbed areas to “*integrate the new form into existing natural dune contours to the south*”. This section outlines the key components of the proposed structure relevant to the Assessment, including **vegetation removal, earthworks, inclusion of an engineered structure, site rehabilitation, and the construction phase.**
9. **Vegetation removal** describes the extent of vegetation required to be removed for construction of the structure. During the site visit it was observed that there is a crest in the existing dune at the northwest end of the proposed sea wall, adjoining the existing sandbags along the edge of Three Mile Creek (see Figure 1 below). Figure 5.0a from the Construction Methodology Statement⁴ indicated that this would be removed as part of the works.

Following the initial review of the Assessment and site visit, clarification was provided in the "GIPS Response to the Request for Further Information" dated December 6, 2024 (the GIPS Response). GIPS confirmed that the proposed structure, including the construction footprint, will not impact the sand crest. The plans in the revised Construction Methodology Statement (Rev C) and Proposed Layout drawing (23038-02-A) have been amended to show the proposed structure stopping short of this dune.

The amended plans do not show this sand crest as being fenced, unlike the other areas of existing vegetation identified to be protected during construction. Although the dune of concern is now identified as being outside the extent of the buried sea wall, the absence of temporary fencing makes it unclear whether it will be impacted by construction works.

³ Para 4.22, page 79, 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines', Tuia Pito Ora New Zealand Institute of Landscape Architects, July 2022.

⁴ Coastal Protection Project Glen Isla Dune, Waihi Beach, Construction Methodology Statement Rev A, Davis Coastal Consultants, October 2024.



Figure 1: Photo of the dune crest at the north end of the site

- 10. **The construction phase** outlines the proposed work hours, timeframes, temporary storage of plant and materials, and site access, which is planned through the Council reserve at 100 Seaforth Road. It provides adequate detail on the sequence of construction and the rock spall placement methodology.

Planning Framework

- 11. The key planning matters from relevant statutory provisions at the national, regional, and local levels are summarised. Excerpts from these statutory framework provisions are included in Appendix B. The referenced documents include the New Zealand Coastal Policy Statement 2010, the Bay of Plenty Regional Policy Statement, the Bay of Plenty Regional Coastal Environment Plan, the Bay of Plenty Regional Natural Resources Plan, and the Western Bay of Plenty District Plan (Operative).
- 12. The summary of key planning matters is comprehensive, and Appendix B provides direct excerpts from the planning documents. However, aside from a brief summary statement in the Executive Summary and Section 13.0 Assessment Against The Statutory Framework, the Assessment lacks commentary on compliance with, or implications of the proposal on the specific relevant statutory provisions.
- 13. The proposal activity status is identified as a **discretionary activity**. The activities relating to the proposal which trigger this activity status are not provided in the Assessment but are outlined in the AEE.

Visual Catchment/Viewing Audience

14. In identifying the viewing audience, it is stated that *“there will be no private views of the site except from the adjacent dwellings on Glen Isla Place (the applicants). Public views will therefore be the most pertinent consideration for this LVA.”*

During the site visit, it was observed that there are dwellings to the north of Three Mile Creek that appear to have private views of the northern end of the site and the site access route. Following the site visit, clarification was sought, and IGL provided the following response:

“The Project Landscape Architect confirms that with the sand crest retained, views of the construction work (which will occur to the south of / behind the crest) will be predominantly screened for existing properties to the north of Three Mile Creek.

For dwellings to the north of Three Mile Creek, any temporary views of the construction activities (e.g. vehicles arriving or leaving) would likely be no more adverse than views of the ongoing maintenance which occurs at Three Mile Creek.

Many properties to the north of Three Mile Creek (along The Loop) include vegetation at boundaries which will screen views towards the site, and the dwellings are distant (more than 100m) from the north end of the site.

At completion of the project, views from north of Three Mile Creek will be of replanted disturbed areas (‘reinstatement area’) at the Glen Isla dune – similar to existing views of the dune.”

This assessment is reasonable, and no further clarification is required.

Natural Character Effects

15. This section assesses the effects on the characteristics and qualities that contribute to natural character. Under the subheading "Landform," it is noted that the site's landform has been modified due to past erosion protection works. While this statement accurately acknowledges the occurrence of modifications, it lacks details on the timing and extent of these changes, and whether the current condition reflects these past modifications. Observations during the site visit indicate that the dune, in its current state, appears to be naturalized or recovering, with vegetation cover. It doesn't appear obviously modified in its entirety.
16. It is stated that *“at completion the proposal will appear as a naturalised, sand dune form and the rock structure will not be visible.”* However, it also explains that parts of the structure could become exposed during large storm events. Footnote 52, citing the Assessment of Coastal Processes⁵, notes that *“over time it is likely that the structure will become increasingly exposed due to the effects of climate change. Beyond 20-30 years the structure may be exposed at all times in large storm events high tide may reach wall.”*

Review commentary and clarification sought via the Section 92 request for further information regarding this inconsistency and the effects on natural character and visual amenity over time is covered in Paragraph (23) below.

⁵ Coastal Protection Project Glen Isla Dune, Waihi Beach, Construction Methodology Statement Rev B, Davis Coastal Consultants, October 2024.

17. The statement that the exposure of the structure beyond 20-30 years “*would be visually consistent with other existing areas of exposed rock revetment along Waihi Beach (to the north of the site)*” is a fair assessment given the presence of existing rock revetments nearby.

Review commentary and clarification sought via the Section 92 request for further information on potential cumulative effects is covered in Paragraph (24) below.

18. The report states that “*overall, at completion of the project (providing a naturalised dune landform with planting), the effect on natural character at the site is assessed as **Moderate-High positive** (with the inclusion of recommendations in this report).*” Similarly, the Executive Summary notes that “*at completion of the project, the effect on natural character at the site is assessed as **Moderate-High positive**. The proposal will provide a naturalised sand dune form with more extensive indigenous planting than currently exists.*”

The assessment clarifies that this effects rating only applies to the natural character at the project's completion. In reality, this rating becomes applicable only once the planting has become established. Given the dynamic nature of the dune environment and the risk of erosion from storm events, achieving vegetation establishment may take considerable time and require ongoing maintenance.

A specific natural character effects rating is not provided for anticipated future scenarios where the structure becomes exposed. Given the relevance to effects-based terminology under the RMA this is important.

Landscape Effects

19. This section addresses the impact on “*urban landscape values*” to prevent redundancy and “*double counting*” of effects already covered in the Natural Character Effects assessment. However, as noted in the response to the Assessment methodology (paragraph 4 above), this approach is inconsistent with the Guidelines. The Assessment lacks a comprehensive evaluation of landscape character as an integrated whole, considering the three overlapping dimensions: **physical, associative, and perceptual**.
20. In response to public access issues, the Assessment explains that there is no established access along the frontage of the GIPS properties, although it is possible to walk along the beach. It argues that the proposed structure will prevent the future loss of public access along the coast, stating:

“Landscape effects relating to the potential for public access are assessed as High positive. The proposed location of the structure will prevent the potential future loss of public access along the coast.”

There are no plans to implement such an access route, which would require further disturbance of the dunes. Therefore, this “*high positive*” effects rating is speculative and should not be relied upon in the Assessment.

21. Regarding the Outstanding Natural Feature (ONF) overlay (S24 Open Coastal Landward Edge Protection Yard), the landscape effects conclusion states that the proposal “*...will avoid adverse effects on the characteristics contributing to values of the ONF overlay.*” However, under the Existing Environment section, while the location of the ONF is identified, it is noted that the District Plan provides limited specific characteristics or values for the ONF. Therefore, it is unclear how this conclusion can be reached without a clear understanding of the values of the ONF which the effects are being assessed against.

Visual Amenity Effects

- 22. The assessment starts by stating that “at completion, the proposal will provide views of a naturalised sand dune with planting.” It should be clarified that the anticipated “naturalised” condition will be achieved once planting has become established. Given the dynamic nature of the dune environment, and risk of erosion from storm events, this condition may take a considerable amount of time and require ongoing maintenance to achieve vegetation establishment.
- 23. The assessment notes that the sea wall is expected to be temporarily exposed due to large storm events and will become increasingly exposed over time due to climate change. Table 5.3.3 from the Assessment of Coastal Processes⁶ describes the expected degree of wall exposure in ten-year increments. It illustrates that the upper 2-3 meters of the wall will be exposed in the long term (i.e. 20-30 years).

Paragraph 10.8 then states: “Effects on visual amenity in views from the beach are assessed overall as **Moderate-High positive**.” It is unclear what timeframe paragraph 10.8 relates to, and whether the increased long term exposure of the sea wall has been considered. Particularly given the considerably positive “moderate-high positive” effects rating.

In seeking clarification, following the initial review of the Assessment and site visit, we requested an assessment of the effects of the proposed sea wall on natural character and visual amenity in the **short, medium and long term**, including commentary on how the incremental exposure of the wall will influence the nature and degree of effect over time.

In the GIPS Response, IGL provided the following statements:

“Should erosion from large-scale storm events cause parts of the structure to become temporarily visible, (likely to occur over the next approximately 20 years), there will be a reduction in natural character at the south end of the site. The effect of the proposed structure on natural character will still be positive because:

- *New planting will be retained to the north and top parts of the dune, (protected by the structure), and this will be an improvement to the existing levels of planting;*
- *The proposed structure will provide a higher-quality “naturalised” edge than the eroded edge which would occur at southern parts of the Glen Isla dune without coastal protection.*

Should parts of the structure become increasingly or permanently exposed (likely to occur only at southern parts, beyond 20 years), the effect of the structure will still be positive because:

- *New planting will be retained to the north and top parts of the dune, (protected by the structure), and this will be an improvement to the existing levels of planting;*
- *The proposal will provide a higher-quality “naturalised” edge than the eroded edge which would occur at southern parts of the Glen Isla dune without coastal protection.”*

⁶ Coastal Protection Project Glen Isla Dune, Waihi Beach, Construction Methodology Statement Rev B, Davis Coastal Consultants, October 2024.

The response outlines the effects over time. However, the *"moderate-high positive"* effects rating seems optimistic and heavily reliant on the assumption of a *"likely edge resulting from the (future) effects of climate change."* This is described as *"the eventual loss of reserve land, loss of (existing) indigenous planting, and an eroded coastal edge which provides poor visual amenity."*

The coastal edge is a dynamic environment, but this assumption is based on the premise that coastal erosion will lead to a substantially and permanently eroded coastal edge, which will be worse in terms of visual amenity compared to an exposed sea wall. The assessment lacks detail and assumptions around what this *"likely edge"* might be, including the timeframe for the eroded coastal edge to recover through natural sand movement or artificial means such as sand replenishment and dune planting. Additionally, the comparison between the proposal and an immediately eroded coastal edge versus an eventually restored coastal edge should reflect different degrees of effect.

24. Clarification was also sought on the potential cumulative effects of the proposal and the existing, fully exposed seawall/ rock revetment approximately 200 meters north (see photo below). This example appears to be a fair representation of the anticipated 20-30 year scenario referred in the Assessment.



Figure 2: Example of a fully exposed seawall approximately 200 metres north of the site

In the GIPS Response, IGL provided the following statement:

"The proposal will, in time, result in a further area of rock wall visible at the coastal edge along Waihi Beach. The cumulative effect will not be adverse. This is because:

- The proposal will result in improved natural character and visual amenity outcomes at the Glen Isla frontage compared to the existing environment;*

- *The proposed structure will be visually consistent with existing rock wall (and will provide better natural character and visual amenity outcomes than some areas of existing rock wall);*
- *The proposal will protect landscape values associated with the Three Mile Creek Reserve and ONF S24; and*
- *The alternative scenario (to the proposal) is the eventual loss of reserve land, loss of (existing) indigenous planting, and an eroded coastal edge which provides poor visual amenity."*

The point that the proposed rock wall will be visually consistent with the existing rock wall is valid. However, commentary is lacking on whether the increase in rock walls along this stretch of coastline will contribute to reaching a tipping point in the landscape's capacity to accommodate the change.

As discussed in (21) above, it is unclear how the conclusion that the proposal will protect the landscape values associated with the ONF can be reached without first describing the ONF's values against which the effects are being assessed.

As discussed in (23) above, the assessment lacks detail and assumptions around the "alternative scenario" to justify the comparison between the proposal and an "eroded coastal edge" with its described "poor visual amenity." Additionally, it does not specify how long this condition would exist following a storm erosion event.

As noted previously, the justification for the proposal based on the "loss of reserve land" is not compelling and should not be relied upon.

Construction Phase Effects

- 25. The description of the construction phase and assessment of effects is well considered. The Assessment does not address potential visual effects on views from Three Mile Creek Reserve and adjacent residences, as mentioned above, however this has been adequately addressed in the response to the request for further information provided by IGL.

Recommendations

- 26. Recommendations for mitigation planting measures are appropriate.
- 27. Recommendations to source rocks of varying sizes to achieve a more "naturalistic appearance" for the revetment may not be feasible due to engineering requirements for the revetment. Nonetheless, the effects ratings of the assessment do not appear to hinge upon the potential inclusion of this design characteristic.

Assessment Against the Statutory Framework

- 28. A brief summary is provided which is consistent with the assessment of effects.

Effects Ratings Summary

- 29. This table summarizes the effects ratings identified in the body of the Assessment. Review commentary on the effects ratings is provided in response to each relevant section above.

Appendix A: Definitions, NZILA Ratings Scale, LVA Methodology

- 30. The LVA Approach and Methodology Section of Appendix A references the Guidelines. However, the Assessment itself lacks an analysis and assessment of effects on **associative** landscape values, which is a fundamental aspect of the Guidelines. The Appendix mentions that "Landscapes have physical, associative, and perceptual dimensions," acknowledging this aspect but not covering it or

following this approach in the assessment itself. Further review commentary on this topic is provided in paragraph (6) above.

Appendix B: Statutory Framework

- 31. A summary of planning policies and objectives relevant to natural character, landscape and visual matters is provided.

Appendix C: Graphic Attachments

- 32. This appendix includes site photos, drawings and cross sections of the proposal, statutory planning maps, and a visual simulation.

The visual simulation captures a view from the beach looking north west towards the site. This simulates the optimal scenario at completion with sand completely covering the revetment and vegetation successfully established. Visual simulations showing a range of scenarios anticipated over time with varying degrees of rock revetment exposure are not provided.

Review Findings

- 33. Generally, the Assessment is a comprehensive document. However, some conclusions appear optimistically positive and lack detail and justification for the assumptions made to reach credible findings. The effects ratings and conclusions, as well as their impact on the effects-based terminology under the RMA, should be reviewed in light of the outcomes of further work identified as follows:
 - The Assessment describes the local coastal landscape characteristics, but is lacking in the description of **associative** values.
 - The Assessment does not address effects on the landscape values derived from the interplay of **physical**, **associative**, and **perceptual** dimensions.
 - Updated design drawings show the sand crest at the north end of the site identified during the site visit as remaining insitu. The drawings should be updated to show temporary fencing around this area, making it clear that this area of dune vegetation is to be protected during the works.
 - The “*moderate-high positive*” Natural Character effects rating only applies to the natural character at the project's completion, and on the assumption that planting has become established. A specific natural character effects rating is not provided for anticipated future scenarios where the structure becomes exposed.
 - Landscape effects relating to the potential for public access are assessed as “*high positive*,” based on the proposal's protection of public land that could potentially be used for public access in the future. While this scenario is not impossible, there are no plans to implement such an access route, which would require further disturbance of the dunes. Therefore, this “*high positive*” effects rating is speculative and should not be relied upon in the Assessment.
 - Visual amenity effects are assessed as “*moderate-high positive*,” based on a comparison with a “*likely edge resulting from the (future) effects of climate change*.” The assessment lacks detail and assumptions about the anticipated “*likely edge*,” including the timeframe for the eroded coastal edge to recover through natural sand movement or manual sand replenishment and dune planting. Additionally, the comparison between the proposal and an immediately eroded coastal edge versus an eventually restored coastal edge should reflect different degrees of effect.

- Recommendations for mitigation planting measures are appropriate, however recommended measures for the design of the rock revetment may not be suitable in terms of engineering requirements and therefore may not be feasible. Nonetheless, it does not seem to be critical to the resulting effects ratings of the Assessment.

Review of Public Submissions

34. WBOPDC received 29 public submissions. After reviewing these submissions, we identified several that include statements relevant to landscape character and visual amenity issues. Below is a summary of the relevant excerpts from these submissions, along with our responses to the key points raised.

Submission 13 - Nigel and Jessica Goodhue

35. *"6. ...The presence of the existing seawall has had adverse effects on the amenity, recreational and ecological values in a number of ways:*

b. Reduction in amenity values for beach users. Sourced boulders are inconsistent with the natural sand dune systems."

- **Response to Submission:** The submitter's statement that the presence of a sea wall can reduce amenity values for beach users is reasonable. It is realistic to expect similar effects in this landscape setting. While the boulders are undoubtedly inconsistent with the natural dune systems' structure and aesthetics, this inconsistency is acknowledged in the Assessment. The Assessment notes that the sourced boulders are intended to visually align with other nearby seawalls. However, our review highlights that while visual consistency with other seawalls is valid, the Assessment does not adequately address potential cumulative effects, as explained in paragraph 24 above.

36. *"8. The proposed seawall will be of similar design and material as these existing consented seawalls. It is evident from the application that the intention of the seawall is that it will become exposed over the duration of its lifetime and incorporated into the Coastal Marine Area. The technical assessment predicts that within a 30- to 40-year time frame, loss of dune planting to the point of full exposure to the toe of the structure may occur and within 40-50 years underscoring may have occurred requiring remedial actions. At the point where the toe is exposed (MHWS) there will be:*

b. Negative impact on amenity values due to the exposure of large rock boulders that are out of character with the existing sand dune system."

- **Response to Submission:** The assertion that the exposed boulders are out of character with the existing sand dune system is reasonable, but it does not consider the broader landscape context and other modified elements. The Assessment evaluates the exposed boulders in the context of other sea walls and considers the alternative scenario of coastal erosion. Commentary on the effects over time and expected landscape changes in a dynamic coastal environment is addressed in Paragraph 23 above.

37. *"Detailed consideration of the actual and potential longer-term effects (loss of public access and amenity) is largely absent in the assessments. Furthermore, where they are discussed, the acceptance of these effects is based on their consistency with the existing seawalls at Waihi Beach. It is inappropriate to accept that the loss of public access, amenity, and ecological values is adequately mitigated simply by pointing to the consistency of these effects with those caused by existing seawalls."*

- **Response to Submission:** These points have relevance to the issue of cumulative effects. Commentary on cumulative effects is addressed in Paragraph 24 above.

Submission 15 - Reginald and Marylyn Goodhue

38. *“The proposed seawall will be of similar design and material as these existing consented seawalls. It is evident from the application that the intention of the seawall is that it will become exposed over the duration of its lifetime and incorporated into the sea (Coastal Marine Area).*

This will result in the same level of adverse effects as the existing seawall specifically significantly reduced public access to the beach at high tide and negative impact on amenity values due to the exposure of large rock boulders.

- **Response to Submission:** A negative impact on amenity values due to the exposure of large boulders is a reasonable concern. The Assessment evaluates the exposed boulders in the context of other sea walls and considers the alternative scenario of coastal erosion. Commentary on the effects over time is addressed in Paragraph 23 above.

Submission 19 - Mark Moynihan

39. *“The most important Goals here is -To protect the Coasts Natural Character, Landscape, and Biodiversity.”*

And;

“This would be nothing but an ugly, invasive and intrusive HAZARD of our beautiful beach and recreational area.”

- **Response to Submission:** The statement is relevant to landscape and visual matters. The Assessment considers visual aspects and takes the stance that the alternative to a structure is an “eroded coastal edge,” which would provide poor visual amenity. Our review questions the assumptions made in the Assessment to reach the “moderate-high positive” effects ratings. We seek more detail on the assumptions regarding the nature of the eroded edge, the timeframe it would remain in this condition, and its ability to be replenished. This is addressed in paragraph 23 above.

Submission 20 - Tauranga Branch Royal Forest and Bird Protection Society

40. *“We question the advice of the Applicant’s Consultant in the AEE that the proposal will result in net benefit for ecological values due to the proposed remediation planting, and that it will have predominantly moderate-high positive effects on natural character, landscape and visual amenity. We do not agree that there can be overall benefit for ecological, landscape and visual amenity values...”*

- **Response to Submission:** Our review commentary considers the “moderate-high positive” effects assessment to be optimistic and lacking in detail and justification for the assumptions made to reach credible findings. Commentary on the positive effects ratings is addressed in paragraphs 18 and 23 above.

41. *“While this is a single example, it could set a precedent for the use of hard structures for wider Waihi Beach and make it more difficult for the council to take a different approach elsewhere.”*

- **Response to Submission:** This point is relevant to the issue of cumulative effects, and it is reasonable to have concerns about this issue. Commentary on cumulative effects is addressed in paragraph 24 above, where it is highlighted that the assessment commentary is lacking on whether the increase in rock walls along this stretch of coastline will contribute to reaching a tipping point in the landscape's capacity to accommodate the change.

Submission 26 - Janmerilai Wingate

42. *“Rock walls potentially create unwanted wave energy effects which cause... loss of habitat, amenity and usable public space could also result.”*

- **Response to Submission:** The point that the rock wall could potentially cause a loss of amenity is reasonable and is considered in the Visual Amenity Effects section of the Assessment. Our review of this section highlights concerns about effects ratings that appear optimistic and lack detail around the assumptions made to reach this conclusion. See paragraph 23 above.

Submission 29 - Helen Meiklejohn

43. *“Covering the Buried Rock Riprap wall with sand and planting it may initially look nice there is no guarantee that the sand and plants will stay there. What happens if it is all washed away as per the sand dune built and planted in front of Shaw Road properties in 2013.”*

- **Response to Submission:** The coverage of sand and planting, and the potential for this to be washed away, is considered in the Assessment and is an anticipated outcome. This is detailed in Table 5.3.3 from the Assessment of Coastal Processes⁷, which sets out the expected timeframe for the wall to be exposed in the long term.

44. *“We may end up with a series of adhoc beach structures adjacent to all residential and the occasional commercial property and an ugly harsh beach front.”*

- **Response to Submission:** This point has relevance to the issue of cumulative effects. Commentary on cumulative effects is addressed in paragraph 24 above, where it is highlighted that the assessment commentary is lacking on whether the increase in rock walls along this stretch of coastline will contribute to reaching a tipping point in the landscape's capacity to accommodate the change.

Yours sincerely



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Copy

Sophie Strachan (technical verifier)

⁷ Coastal Protection Project Glen Isla Dune, Waihi Beach, Construction Methodology Statement Rev B, Davis Coastal Consultants, October 2024.