

Reserves and Facilities Manager

Site Address: Glen Isla Place, Waihi Beach

RC Number: RC14513L

Date: 4 July 2025

1. Reasons for referral:

- Submitters raised issues with:
 - The proposed rock revetment wall is located in Council reserve
 - Future maintenance costs will fall to Council
 - Submitters raise that the proposal is contrary to Council's Coastal Erosion Responses Policy 2017
- The seawall will be vested in Council in future
 - WBOPDC – Reserves and Facilities will become the consent holder, responsible for all conditions of the resource consent (if approved).
 - Conditions of consent (if approved) will include on-going maintenance, repair and monitoring of the surrounding dune system (includes replacement planting, pest/weed control and structural stability) and the seawall structure (structural stability). Conditions will also address the provision of public access across the life of the wall.

Rule /Topic	Planner Comments/Questions	Reserves Comments
9 submitters raised concerns with the costs and responsibility to Council and ratepayers of the future	Please provide any details of any agreement between the applicant and Council on operational cost and responsibilities.	• The agreement between Council and the property owners includes provision whereas Council will pay all costs of keeping and maintaining the Coastal Protection to the extent they are covered by any targeted rate applied to the waterfront properties at Glen Isla Place.

maintenance and remedial costs.	Please provide information on the future costs, associated with the wall, and the term the Council continue maintenance. Please confirm if the targeted rates would be sufficient for annual maintenance, including works required to respond to damage from a severe storm event?	(The 2025/26 amount GST Inclusive is \$813.32 per property). Any additional costs shall be paid by the owners of the waterfront properties at Glen Isla Place. I recommend a condition of consent require the agreement be finalised and in place prior to the construction of the wall commencing. Effectively, Council's obligations to its financial commitment under the current resource consent for the dune restoration (which has not performed as planned) remain the same with its obligations being funded by existing targeted rates applicable to the subject Glen Isla Place properties. • Future costs associated with the wall are forecast to be relatively low, as most of the wall will be buried. • Council will limit any maintenance to the life of any approved resource consent term. The reason for this is – with climate change – it seems likely that the requirement to maintain any structure will increase over time. • The agreement with the applicant limits financial risk exposure to the value of the targeted rates that it collects from the subject properties at Glen Isla Place. • Council does not want to be in position of trying to hold back the ocean forever to protect private properties.
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	Could the wall be partially/fully rebuilt? Will there become a point when the wall is no longer maintained by Council in the future? Would Council wish to remove the wall in full at that point. i.e deteriorated after significant storms, cost to repair. Once the wall is within the CMA due to sea level rise the wall will become a structure in the CMA. At this time a new consent is required from BOPRC for its ongoing occupation, repair, and maintenance within the CMA. Would Council likely pursue a new consent for the ongoing maintenance or would it likely remove the wall?	• The current targeted rates for the dune restoration applicable to the subject properties will cover any planned annual maintenance • The rebuilding of the wall whether partially or fully rebuilt would be subject to any resource consent condition(s) and funding by the applicant. • Yes. The proposed 'owner's property covenant' requires the owner to pay any reasonable costs of maintaining the coastal protection works over and above the target rate which is also paid by the owners(applicant). Council has no obligation beyond the resource consent period. • Any repair costs of significant damage due to a serve storm event are covered are covered by the property owners as they are the primary benefactors of the protection structure. Any repairs would be undertaken as per any conditions contained in a resource consent. • Should this scenario ever arise, then any required consents resulting from planning rules at that time would need to be complied with.
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		This scenario assumes that any resource consent in place would have reached its useful life, noting that Council's obligations are restricted to the length of any consent that might be granted through this application
20 submitters raised concerns with the location of the structure on public reserve land rather than within the applicants private property.	Projects and Monitoring Committee approved as landowner a location in the reserve in October 2023. Please set out your understanding of the seawall alignment/ location within the reserve. How does the location fit within Council's Coastal Erosion Response Policy? Is there any long term benefit to Council for the wall in this location?	- The location and alignment as are per the drawings in the application. - The location is not inconsistent with the Coastal Erosion Response Policy 2017 in that it protects an esplanade reserve that is subject to the Reserves Act 1977. Section 10 – Definitions- of the Coastal Erosion response Policy identifies reserves subject to the Reserves Act are deemed a strategic asset(s) Strategic asset(s) means for the purposes of this policy that Council considers the following assets to be strategic assets: - The roading network as a whole - Reserves listed and managed under the Reserves Act 1997 excluding: (a) Reserves identified for investigation for disposal in an adopted Reserve Management Plan - Yes, in that the buried wall will prevent further loss of the rear dune due to any future erosion. The consent for the Three Mile Creek area allows for any dredgings of sand from clearing the creek to be deposited in and around the three-mile creek coastal protection structures (sand

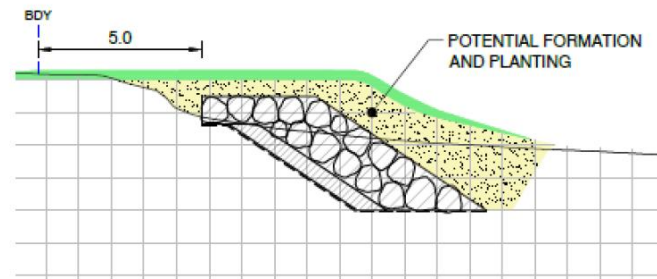
	Do you have any requirements/ conditions for the construction period within the reserve? Do you have any other comments to add?	pillows) thereby helping to renourish the sand dunes in the immediate area associated with this application.
10 submitters raised concerns with the impact on public access along the beach in the future at high tide as the structure becomes exposed due to scour.	As sea level rises and the wall becomes exposed how will council address on-going public access along the length of the wall?	There is little to no public access along this section of dunes. The aerial image below shows the primary access point to the beach by the public and some shared pathways used by local residents to access the beach. There is no clear evidence of public access along the existing dune parallel to the beach as there are no worn trails through the dune due to high use. 

	As part of ongoing maintenance would Council consider a formal public access along the top of the wall/ within the 5m setback area?	It is important to note that Council under section 40 of the Reserves Act 1977, in its capacity as administering body for the reserve, has the ability to take such measures to ensure the ... , <i>protection , and preservation, as the case may require...</i> 40 Functions of administering body (1) The administering body shall be charged with the duty of administering, managing, and controlling the reserve under its control and management in accordance with the appropriate provisions of this Act and in terms of its appointment and the means at its disposal, so as to ensure the use, enjoyment, development, maintenance, protection, and preservation, as the case may require, of the reserve for the purpose for which it is classified. This function may include preventing the public from accessing an area of sensitive sand dune vegetation in order to protect or preserve it. • It is unlikely that a formal accessway would be developed across the top of the wall as most of the wall would be buried and access through dune vegetation is not best practice under Coast Care principles, which WBOPDC have developed with other partner agencies.
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As part of the rehabilitation of the site following construction the applicant proposes planting on top and behind the wall between the property boundary and the wall. See image example to the right.

Do you have any concerns about future public access behind the wall and the location on the proposed planting?

Do you have any other comments on public access along this part of the beach/ reserve?



Completed Southern Wall section (Figure 7.1 from the Construction Methodology Statement, Davis Coastal Consultants, October 2024; page 13).

- For the reasons outlined above, there is no clear demand for a public accessway, nor is it best practice to promote an accessway through the dune that damages dune vegetation.
- There is no physical evidence for demand for access along this part of the dunes eg worn accessways.
- The aerial image below shows the primary accessway that facilitates public access to and along the beach. There is no need to access along the site where the seawall is to be constructed (buried).
- If the area is known for dotterel nesting, then public entry should be restricted.

	Do you have any comment on the future restriction of public access in front of the wall as the high tide mark reaches the exposed wall? Noting alternate public access locations within Island View Reserve to the south	 I assume this means for a short period of the tidal cycle; it might be restricted at this point by high tide going up to the base of the dune/erosion protection structure. I would need to see the evidence that demonstrates the likelihood of this occurring as there is approximately 20 metres of distance between the proposed protection structure and the high tide mark showing on the aerial image above.
Term of the resource consent	The resource consent is for a seawall that has been designed with a 100 year lifetime, however the expert evidence shows the wall will become exposed in 20-30 years and MHWS at the base of the wall in 30-40 years. Does Council have any requirement for length	Council's agreement with the applicant is applicable for the term of the consent eg 30 years and /or the in the event of a force majeure event that damaged the wall beyond economic repair.

	of term of consent/ ongoing maintenance? Will there become a point due to significant deterioration where the wall would not be repaired, and if so would it be removed by Council. If Regional Council consent could be obtained, would Council wish to maintain the seawall once it is within MHWS/CMA? At what point would Council consider it no longer viable to continue repair and maintenance of the wall? Would Council repair the wall after significant storm events that severely deteriorated the wall?	• I recommend an expiry of consent based on the structural integrity and damage beyond economic repair or a fixed term of the consent should it be granted. • Should this scenario ever arise, then any existing consent resulting from planning rules at that time would need to be complied with for the removal of the erosion protection structure. There would be discussion with the adjoining property owners as to the available options in the event that would like to invest private money into a alternate solution. • This would be subject to any agreement with adjoining property owners noting Council's current Coastal Erosion Response Policy. • At the point where the adjoining property owners no longer wish to fund any repair or maintenance work or that the term of the consent had expired. This will be included in the agreement. • This would be subject to review at the time to consider the economics associated with any such deterioration /damage to the wall. The cost of any repairs post a significant storm would be borne by the adjoining landowners.
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	Time	Wall Exposure	
	0-10 years	Wall buried, 1-2 possible exposures of upper 1-1.5m	
	10-20 years	Top of 1m wall exposed for long periods. During storms upper 1.5-2.0m exposed during storm events greater than any that have occurred in the last 20 years.. Wall covers back up but upper meeting exposed	
	20-30 years	Upper 2-3m of face of wall exposed at all times. High tide may reach structure in large storm events.	
	30-40 years	MHWS at base of wall. Access in front may become limited for 1-2hr around high tide	
	40-50 years	High tide at wall. Scouring during storm events may threaten toe and remedial to toe may be required. Over topping may require raising wall crest.	
	50 -100 years	With beach retreat and sea level rise as predicted, significant upgrade may be required on the wall including increase in outer armour size which could be overlayed on the outer face. Foundation would need to be lowered or improved. Over topping may require raising wall crest.	
Other Matters			
Existing Groyne consents	The Consents granted in 2008 are due to expire in 2032, which cover the groynes and seawall structures between 2-Mile and 3-Mile Creek. Does Council have any indication at this time if these consent will be renewed or alternative consents/options sought? Will integrated coastal management options be considered?		The decision for integrated coastal management options have yet to be determined. At the time of determining its options (circa 2028/29) consideration will be given to renewing existing consents or seeking new/ alternative consents/options. This approach will be done in the context of relevant legislation at the time.
Concluding remarks	Overall what do you consider the effect on the reserve and public access to be? Overall do you consider the structure to be		- Given that most of the structure will be buried, I don't consider there to be any significant detrimental effect on the reserve from an aesthetic and functional perspective. - Having the structure in its proposed location is

	acceptable in the reserve Do you consider there be any effects from the eventual loss of public access along the hightide line in front of the wall as it becomes exposed?	acceptable to the functionality and operation of the reserve. Any future loss of all tide access along the coast won't be limited to this section of the beach
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2. Conditions

Happy to review any draft conditions that are prepared prior to being finalised.

Any other Comments from Reserves and Facilities Manager

3. Time Taken: (3 hours).