

BEFORE THE WESTERN BAY OF PLENTY DISTRICT COUNCIL

IN THE MATTER OF of the Resource Management Act 1991

AND of a resource consent application by Glen Isla Protection
Society Inc.

UNDER section 88 of the Resource Management Act 1991 for the
activities associated with the construction and use of a
coastal protection structure

STATEMENT OF EVIDENCE BY BRADDYN (BRAD) THOMAS COOMBS

25 JULY 2025 DRAFT

1. EXECUTIVE SUMMARY

- i. The remnant natural dune at Glen Isla Place has eroded since historic erosion protection was removed and the Three Mile Creek works were constructed.
- ii. The erosion from Cyclone Gabrielle in 2023 partially exposed further historic erosion protection structures which underly the existing sand dunes at Glen Isla Place.
- iii. Waihi Beach is part of Outstanding Natural feature ONF S24 in the Western Bay of Plenty District Plan (the District Plan) which is a generic (up to) 100m off set from MHWS. ONF S24 includes the natural beach and dune systems as well as erosion protection structures at Waihi Beach.
- iv. Submissions and technical reviews have been considered and responded to in relation to any concerns that have been raised on natural character and landscape effects.
- v. The erosion protection structure has been designed to be integrated into the remnant dune system as far as is possible, with the structure entirely buried after construction, with the potential for exposure of one end after high energy erosion events.
- vi. The Glen Isla Place erosion protection structure is consistent with and in some respects is a better outcome in natural character and landscape terms than other existing erosion protection works at Waihi Beach.
- vii. The erosion protection structure at Glen Isla Place can be developed to ensure that it protects the natural character and landscape values of the beach and protects the reserve and adjacent properties, leading to positive overall natural character and landscape effects.

2. INTRODUCTION

Qualifications and experience

- 2.1 My full name is Braddyn Thomas Coombs.
- 2.2 I have the qualifications of Bachelor of Landscape Architecture (BLA) from Lincoln University and Bachelor of Horticulture from Massey University. I am a Principal Landscape Architect at Isthmus Group Ltd. I have over 27 years' professional experience as a landscape architect working in New Zealand and the United Kingdom. I am a Fellow and Registered member of Tuia Pito Ora, the New Zealand Institute of Landscape Architects (TPO NZILA) and I am a past national President. I am a member of the Resource Management Law Association (RMLA). I have completed the Ministry for the Environments' Making Good Decisions RMA Commissioner training and I have acted as an Independent Commissioner on several resource consent and Plan review processes.
- 2.3 Of particular relevance to this application, I have undertaken landscape, natural character and visual assessment work in the coastal environment for:
- > The Waihi Beach Seawall protection works adjacent to the project site at 3 Mile Creek and further to the northwest (consented by the Environment Court in 2007);
 - > The Bledisloe Park Seawall protection works, Little Waihi (2015);
 - > The Ōrewa seawall and coastal walkway works (consented by the Environment Court in 2020);
 - > The applications to abandon the wreck of the MV Rena on Otaiti (Astrolabe Reef) as part of a review undertaken for the Crown Law Office in support of their submission on the applications (2016);
 - > The extension to the Half Moon Bay Marina (Auckland) (2015);
 - > The extension to the Waikawa Marina (Marlborough) (2017);

- > Review of the applications to extend the Port of Tauranga along the Mount Maunganui and Sulphur Point wharves and associated dredging (of the Stella channel) for the Bay of Plenty Regional Council (2021 – ongoing);
 - > Several coastal subdivision and development projects within Tauranga and the Western Bay of Plenty for various applications and reviews of applications for both Councils over 20 years.
- 2.4 I am familiar with the application to construct a buried coastal protection structure (a rock revetment / seawall) within the Glen Isla dune at Waihi Beach, adjacent to Glen Isla Place. My involvement with the proposal included providing design input from a visual, landscape and natural character effects perspective; co-authoring the Landscape and Visual Assessment Report (LVA) for the proposal; and review of the visual simulation prepared to accompany the LVA for the consent application.
- 2.5 I co-authored the LVA with one of my colleagues at Isthmus.¹
- 2.6 I have visited Waihi Beach on several occasions and undertook site visits to the Glen Isla dune and surrounds for the purpose of considering this proposal. My site visits were undertaken on 5 April 2024 and 12 July 2024 as well as visits to the general vicinity more recently. I am familiar with the site and its surrounding context.

Purpose and scope of evidence

- 2.7 The purpose of my evidence is to assess the landscape, natural character and visual effects of the coastal protection structure proposed to be buried within the Glen Isla dune, at the coastal frontage of residential properties on Glen Isla Place.
- 2.8 Appended to this evidence are Graphic Attachments including a photo simulation which illustrates and represents the proposed coastal

¹ The LVA was co-authored with Rose Armstrong, Associate Landscape Architect at Isthmus. Rose has 20 years' experience as a Landscape Architect and has specialised in assessment work for over 10 years.

protection structure at completion, as seen from Waihi Beach close to (just south of) the Glen Isla dune.

2.9 My evidence is set out as follows:

- > Evidential Summary of the LVA;
- > Response to the second s92 Request for Further Information;
- > Response to submissions;
- > Conclusions.

2.10 The methodology used for my assessment of the proposal and this evidence is consistent with Te Tangi a te Manu, the Aoteroa New Zealand Landscape Assessment Guidelines provided by Tuia Pito Ora, the New Zealand Institute of Landscape Architects (TPO NZILA). A methodology statement and key definitions and explanations used are set out at Appendix A and in the LVA.

Expert Witness Code of Conduct

2.11 I have been provided with a copy of the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note 2023. I have read and agree to comply with that Code. This evidence is within my area of expertise, except where I state that I am relying upon the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

3. EVIDENTIAL SUMMARY OF THE LANDSCAPE AND VISUAL ASSESSMENT

3.1 This section is a summary of the LVA Report. The LVA contains detailed description of the design process, the proposal (vegetation removal, earthworks, the engineered structure, site rehabilitation and construction), description and evaluation of the receiving environment and the site of the proposal, the relevant statutory provisions and assessment of the natural character, landscape and visual amenity effects of the proposal. The full detailed description and assessment from the LVA is not repeated here.

This evidence should be read in conjunction with the LVA and the response to the Western Bay of Plenty District Council (the “District Council”) second s92 request for further information.

Proposal overview

- 3.2 The Glen Isla Protection Society Incorporated (“GIPS”) proposes to construct a buried coastal protection structure (“the structure”) at the coastal dune frontage of Glen Isla Place – just south of Three Mile Creek at Waihi Beach. The structure is proposed to be located inside Three Mile Creek Reserve seaward of Glen Isla Place. The location set out in the application is shown below in Figure 1 and the details of the construction of the structure are illustrated in Figures 2 to 4.



Figure 1: Site location, Three Mile Creek Reserve at the frontage of Glen Isla Place, Waihi Beach.

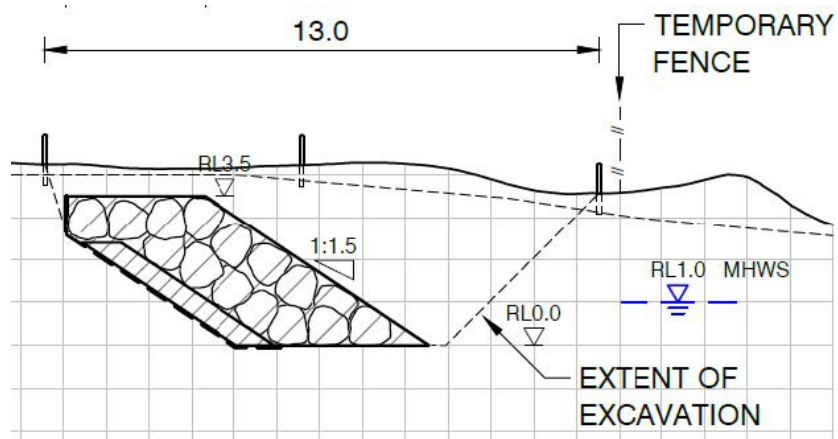


Figure 2: Indicative excavation to place wall (Figure 5.0b from the Construction Methodology Statement, Davis Coastal Consultants, October 2024; page 10).

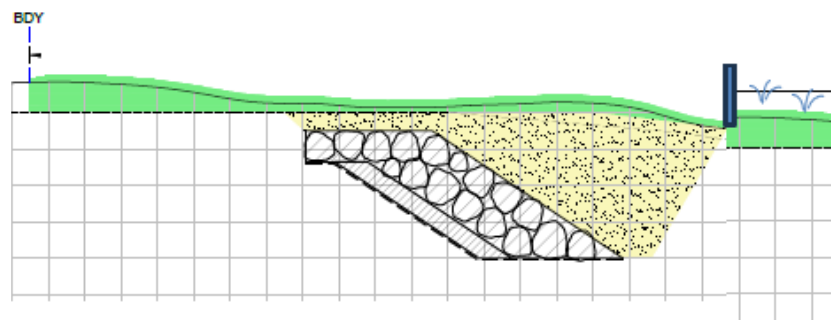


Figure 3: Completed Northern Wall section (Figure 7.2b from the Construction Methodology Statement, Davis Coastal Consultants, October 2024; page 15).

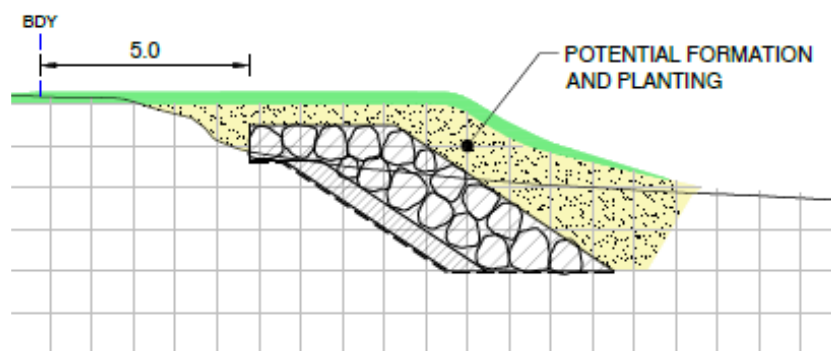


Figure 4: Southern Wall section (Figure 7.1 from the Construction Methodology Statement, Davis Coastal Consultants, October 2024; page 13).

- 3.3 The dune frontage at Glen Isla Place is subject to historical and ongoing erosion and has sustained considerable damage at times from large storm events (including Cyclone Gabrielle in 2023). The structure is designed to protect the adjacent reserve land and adjacent residential properties from further erosion and future-proof this land from the effects of sea-level rise.
- 3.4 At completion, the proposed structure will be buried/covered with sand to match the dune contours and planted with indigenous dune species; and is to be vested with the District Council.
- 3.5 As the site is located within the Coastal Environment, the New Zealand Coastal Policy Statement (“NZCPS”) is relevant.² Effects on natural character³ and natural landscapes and features in the coastal environment are key considerations.
- 3.6 The site has not been identified in any statutory planning documents as having Outstanding, Very High or High natural character values.
- 3.7 The site is within an Outstanding Natural Feature (“ONF”) overlay in the Western Bay of Plenty District Plan (“the District Plan”). The overlay extends the length of the coastal edge along Waihi Beach, from Orokawa Bay to Bowentown. ONF S24 - Open Coastal Landscape Landward Edge Protection Yard. The District Plan identifies that the ONF contains “all land adjoining the open coastline, zoned Rural and within 100m of MHWS”. No other specific characteristics or values are identified in the District Plan for the ONF other than this generic description. Where private property boundaries are within the 100m offset from MHWS, the boundary of the ONF is at the property boundary. This is the case at Glen Isla Place

² Refer to Appendix B for the relevant objectives and policies of the NZCPS.

³ Natural character (as set out in Te Tangi a te Manu, the Aotearoa Landscape Assessment Guidelines provided by Tuia Pito Or the New Zealand Institute of Landscape Architects), is part of the overall landscape character of an area and varies within the specific context. Natural character can be experienced differently by different people. It is the result of the combined levels of indigenous nature (that is, the biophysical values) and perceived nature (the experiential values), which are typically defined by the extent to which natural patterns, elements and processes occur and are legible, and the nature and extent of human modifications.

- 3.8 ONF S24 is identified at a broad, district-wide scale and takes in differing attributes and values in different parts of the overlay. In places i ONF S24 includes existing coastal protection structures on Waihi Beach (rock revetment, access steps, groynes, etc).

Existing environment

Context

- 3.9 As described, the site's wider landscape context is provided by Waihi Beach. Landscape values at Waihi Beach are closely aligned with the coastal location, the interaction with the sea and its natural character.
- 3.10 Existing natural character within the Waihi Beach area is characterised by the broad open beaches and dune systems. While the beach and dune systems retain a relatively natural profile in places, development (including residential development and associated accessways and erosion protection works) have altered the profile on parts of the coastal edge and have reduced its natural character through the presence of structures.
- 3.11 In places development (including dwellings) are on or close to the foredune crest. This has compromised natural elements and processes, including indigenous vegetation and the natural dune erosion and accretion process, and has resulted in a tension between dynamic coastal erosion processes and the static seaward residential boundaries, which are within the coastal erosion zone.
- 3.12 To protect the developed edge there is now approximately 1.3km of rock revetment along the landward edge of the beach (to the north of the Glen Isla Place site⁴), and groynes installed at Three Mile Creek to manage erosion at the mouth of the creek (adjacent to the site to the north).

⁴ This occurs at the frontages of The Loop and parts of Shaw Road.

Site

- 3.13 Landscape characteristics at the site contributing to the values of ONF S24 derive largely from the site's natural character and the interaction between the sea and the land at the intertidal zone. Additionally, the site contributes landscape values associated with access along the coastal edge, through Three Mile Creek Reserve.⁵
- 3.14 The site contributes to the natural character of Waihi Beach through its naturalised dune landform and planting. The dune is seen within a modified context which includes residential development and other structures visible close to the site, including the near-by coastal protection groynes at Three Mile Creek.
- 3.15 The Glen Isla dune is a naturalised rather than natural (unmodified) form, with past modifications having occurred at the dune (including an historic seawall⁶) to provide coastal protection for residential development.
- 3.16 I consider that key site characteristics at the site contributing to natural character (as experienced from the beach/coastal edge) are:
- > A dynamic coastal edge, with a wind-blown/eroded character to lower portions of the dune face;
 - > A naturalised appearance to the sand-dune landform (noting however that past landform modifications have occurred);
 - > Naturalised planting on upper portions of the dune-face and top, comprising a mix of predominantly low-growing indigenous and exotic species, with exotic weeds present. Exotic amenity plantings are visible from the beach, including large and prominent species (Norfolk Pine). There is an area of high-value indigenous vegetation on northern parts of the dune (spinifex and pingao);

⁵ Currently there is no formed public access through the reserve at the Glen Isla dune, although the existing width of the reserve in front of the GIPS properties provides for this, should the District Council wish to provide it. The GIPS proposal does not include provision of a public accessway.

⁶ This was an engineered, Ohinemuri Council constructed barrier consisting of vertical steel posts and timber boards retaining a rock carpet behind and large gabion basket groynes at approximately 40m centres perpendicular to the wall.

- > Clear and prominent views of dwellings and structures at the top of /behind the dune (housing, fencing, garden/pergola-type structures, private accessways/paths);
- > Interrupted natural patterns and processes from the earlier coastal protection works at and near the site, and the establishment of residential development adjacent to/at the top rear parts of the dune.

3.17 Overall, the site contributes to the natural character of Waihi Beach through its naturalised dune landform and planting. The site's natural character is lowered by the dune modifications undertaken to provide coastal protection for residential development; the exotic and residential/amenity plantings present on the dune (and visible from the beach); and the clear views of dwellings and associated structures (fencing and garden structures) at the top of the dune.

3.18 In my observations, the site's natural character is consistent with its classification as an area which does **not** reach the threshold of Outstanding, Very High or High natural character. The natural character values of the beach and the intertidal zone are higher than the site of the proposal.

Visual catchment

3.19 Private views of the proposal are limited to views from Glen Isla Place (from the applicants' properties). Properties to the north of Three Mile Creek (along The Loop) tend to 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.

3.20 Public views are available from the beach and from areas along Three Mile Creek, with reserve users having views of the north end of the proposal.

3.21 The potential visual catchment is shown in Figure 5 below.



Figure 5: Potential Visual catchment.

Effects from the proposal

Natural character

- 3.22 In my opinion, at completion the proposal will have a **Moderate-High positive** effect on the site's natural character. This is because the proposal will provide a naturalised sand dune form with more extensive indigenous planting than currently exists. This is shown in the photo simulation at Appendix C.
- 3.23 Should erosion cause parts of the structure to become visible in the future,⁷ there will be a reduction in natural character at the south end of the site, within the 50 year design life of the structure.⁸ If the south end of the wall is exposed, the adverse effect will be temporary, until the sand dune face is re-established through ongoing natural processes.⁹ Beyond 20

⁷ Erosion could occur from large storm events and (in time) may be exacerbated by the effects of climate change and related sea-level rise.

⁸ The northern end of the structure will be unlikely to become exposed, as advised by the coastal engineers for the project.

⁹ Refer to the photos provided in Appendix C to the LVA, which document the recovery process at the Glen Isla dune, after erosion caused by Cyclone Gabrielle in 2023.

years the structure is likely to become increasingly exposed due to effects from climate change.

- 3.24 If exposed, (either in the short or long term), the structure would be seen with the new planting retained to the north and top parts of the dune (at areas protected by the structure). It will be seen as part of a modified sand dune context which includes other structures close to the site; and would be visually consistent with other areas of rock revetment and adjacent residential development to the north of the site along Waihi Beach (and will provide a better landscape and visual outcome than the exposed rock revetment to the north which does not include planting or the necessary depth for sand accretion). The erosion protection structure provides a physical scaffold for natural sand dune recovery, whereas continued erosion of the dune back towards the Glen Isla Place properties could lead to reduced natural dune accretion following an erosion event.
- 3.25 In the long term, the structure will ensure a higher-quality coastal edge (providing a “naturalised” appearance of rock revetment seen together with planting), than would be likely to occur with the (future) effects of climate change if the current remnant dune was left to erode.
- 3.26 In my opinion the cumulative effect (with partial exposure of rock over time and considering existing rock revetment along the beach) will not be adverse, due to the proposal providing a positive effect at the site (with the positive effect potentially reducing over time but remaining positive), as explained.

Landscape

- 3.27 The assessment of effects and this evidence takes the approach whereby effects on natural features / natural landscape are considered under the heading of “natural character” and not considered again under the heading of “landscape”. Natural features and landscapes (including vegetation and landform) contribute to both landscape and natural character values in an area. This approach is taken to avoid double-counting of effects and to

reduce unnecessary repetition. Effects assessment under the “landscape” heading considers effects on additional landscape values to those deriving from natural features/natural landscape (such as urban landscape values – in this case relating to the potential for future public access through coastal reserve).

- 3.28 The location of the structure will provide the opportunity for public access along the coast, if required and deemed appropriate by the District Council in future. I consider this to be a **High positive** landscape effect from the proposal.
- 3.29 The proposal will be consistent with characteristics and values in near-by parts¹⁰ of ONF S24, and in my opinion will avoid adverse effects on the characteristics and values contributing to the ONF, which are associated with the open beach environment and the intertidal zone.
- 3.30 ONF S24 includes other coastal protection structures (rock revetment, groynes and access steps), which form part of the ONF without adverse effects on its values.

Visual amenity

- 3.31 Private views of the site will be limited to views from the adjacent dwellings on Glen Isla Place (the applicants). The main public views will be from Waihi Beach; and from parts of Three Mile Creek Reserve just north of the site.
- 3.32 In views from Waihi Beach I consider that there will be a **Moderate-High positive** effect on visual amenity at completion of the project, from views of enhanced and more extensive areas of naturalised indigenous planting at the Glen Isla dune.
- 3.33 In views from Three Mile Creek to the north of the site in my opinion there will be a **Neutral** effect, as views will be of new planting at the northern end

¹⁰ At Three Mile Creek there are groynes and north of Three Mile Creek there is the rock revetment wall extending to the north.

of the site, across the existing groynes and the change will be less discernible.

- 3.34 While positive effects will reduce beyond approximately 20 years with the potential exposure of southern parts of the buried rock structure, the visual amenity effect will remain positive, when compared with the alternative eroded edge likely to result over time from climate change (without the protection of the structure).

Construction

- 3.35 I consider temporary effects from construction will be **Low adverse**, due to the appropriate proposed timing of works (winter), the proposed construction methodology and the temporary nature of the effects.

Statutory

- 3.36 In my opinion the proposal will be consistent with the relevant statutory provisions. It will preserve the natural character of the coastal environment; protect natural features and landscapes of the coastal environment from inappropriate subdivision, use and development; promote restoration or rehabilitation of the natural character of the coastal environment, and in particular Policy 15 of the NZCPS by avoiding adverse effects on outstanding natural feature ONF S24.

Summary of effects

- 3.37 The following table provides a summary of effects ratings for the proposal, as assessed in the LVA.

Effect	Rating at completion	Rating over time ¹¹
Natural character	Moderate-high positive	Positive effect reducing, but remaining positive compared to effects from leaving the site to erode.

¹¹ Assuming southern parts of the structure become increasingly exposed due to climate change.

Landscape	High positive	Positive effect reducing, but remaining positive compared to effects from erosion.
Visual amenity (public views)¹²		
Waihi Beach	Moderate-high positive	Positive effect reducing, but remaining positive compared to effects from erosion.
Three Mile Creek (north of the site)	Neutral	Remaining Neutral, as the north end of the structure is not expected to become exposed.
Construction (temporary effects)	Low adverse	Temporary. No long term effect.

Table 1: Natural Character, Landscape and Visual Amenity Effects

Summary

4. SECTION 92 REQUEST FOR FURTHER INFORMATION (RFI)

- 4.1 Following the review of the LVA (as summarised above), the District Council provided a second s92 request for further information, including requests for specific information from their landscape advisor. The information requested included further detail on the approach and methodology of the assessment, categorising the landscape values and effects into physical, associative and perceptual effects, requesting a list of specific characteristics that relate to District Plan ONF S24, further justification for the suggestion of future public access being protected by the structure, further explanation of the future likely edge condition should erosion continue, consideration of natural sand management and replenishment, further consideration of cumulative effects and an understanding of the variability of the size of rocks to be used in the structure.

¹² Private views are limited to views from the adjacent dwellings on Glen Isla Place (the applicants).

- 4.2 A detailed response to the second s92 request for further information was provided, dated 30 April 2025. The summary of the conclusions from that response and the reasons for them provide a useful overview:

The landscape, visual and natural character effects of the proposal are summarised as being largely positive in the Assessment. The (temporary) effects during construction are assessed as low adverse. Given that the construction of the wall is a necessary step towards the completed project and the subsequent positive effects, the project is appropriate in the context of the existing environment of the site and the wider landscape of Waihi Beach for the following reasons:

- i. The open beach and seascape of Waihi Beach (including areas of existing coastal protection structures and groynes) identified within landscape feature S24 will not be adversely affected by the GIPS structure due to the limited scale and the proactive mitigation measures, including the design and location of the structure, burying the structure, the recontouring of the dune and the indigenous coastal planting.*
- ii. The landward side of the beach (the upper beach, dunes, seawall structures, groynes and adjacent residential development) is a combination of largely natural in some places (for example at the Island View Reserve) and highly modified in others (for example in front of Glen Isla Place, at the Three Mile Creek mouth and for a distance of some 1.5km to the northwest of the project site. The project site is in the modified part of the dune backdrop to the beach and will be consistent with other parts of the beach profile.*
- iii. The elevated landscape and natural character values of Waihi Beach and the adjacent seascape will not be adversely affected by the construction of the structure (other than temporarily) and will ultimately be protected and enhanced with mitigation measures that are more sympathetic and effective than other public coastal protection structures at Waihi Beach, that is, the*

proposed GIPS structure is a better outcome from a landscape and natural character perspective.

- 4.3 Each of the requests was responded to in detail, including further detail and explanation on each of the points and photographs to illustrate the further assessment.
- 4.4 The District Council's landscape advisor questioned the 'optimistic' conclusions from the LVA. I will address this further at the end of the response to submissions below.

5. RESPONSE TO SECTION 42A REPORT

- 5.1 I have read the relevant sections of the Section 42A report from the Council planner. The Section 42A report recommends to the Commissioners either decline of the consent application, or approval of the consent application, with conditions.
- 5.2 At paragraphs 177-193 of the Section 42A Report, the Council planner has summarised the Councils specialist landscape reviewer, Mr Will Gumbleys' Peer Review and response to the Section 92 Request for Further Information. I have read Mr Gumbleys' Final Landscape and Visual Effects Review, Attachment 14 to the Section 42A Report.
- 5.3 Summary tables are provided in the Section 42A Report comparing my effects conclusions and Mr Gumbleys' conclusions:

Effect	My effects conclusions	Mr Gumbleys' effects conclusions
Natural character	Moderate-high positive	Neutral
Landscape	High positive	Neutral
Visual amenity (public views)¹³		
Waihi Beach	Moderate-high positive	Low Positive

¹³ Private views are limited to views from the adjacent dwellings on Glen Isla Place (the applicants).

Three Mile Creek (north of the site)	Neutral	Low positive
Construction (temporary effects)	Low adverse	Low adverse

- 5.4 The main area of disagreement in relation to the effects of the proposal are in relation to natural character and landscape effects. I acknowledge the distance between my conclusions and Mr Gumbley's on these key matters. We are much closer together on the visual amenity and construction effects.
- 5.5 I consider that the main reason for the distance between our conclusions on natural character and landscape effects is the apparent existing natural character and landscape character of the **project site**. I acknowledge that the beach, the intertidal area and the open ocean landscape and seascape at Waihi Beach is largely natural. However, in my opinion, this changes at the back of the beach where even relatively natural **looking** landforms, such as the Glen Isla Dune have been subject to considerable historical disturbance and management over long periods of time, as described and illustrated in my LVA Report. Other parts of the dune environment, to the north of the site, include coastal protection structures in situ. I have also come to the conclusion that the alternative to a functioning coastal protection structure – leading to the inevitable erosion of the dune environment and potentially the adjacent properties, would lead to significant adverse natural character and landscape effects on the beach environment.
- 5.6 I suspect that Mr Gumbley may consider the Glen Isla Dune to be more natural in formation and appearance.
- 5.7 Regardless of these differences in the various effects conclusions, Mr Gumbley has come to the ultimate 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.

- 5.8 My Gumbleys' conclusion is subject to the preparation and successful implementation of a Sand and Vegetation Management Plan, as detailed in the Wildlands Ecological Review for the Council (Attachment 13 to the s42A Report). I have read the relevant sections of the Wildlands review, and I disagree that a Sand and Vegetation Management Plan will be required for the recovering of the protection structure with sand from a landscape or visual amenity perspective.
- 5.9 As described and illustrated in my LVA, after Cyclone Gabrielle, sand naturally accreted at the site shortly after the erosion event. While the erosion event may expose the wall for a short period of time, the sand will accrete through natural processes, as it has done in the past and particularly if natural vegetation remains on the crest of the dune behind the wall. This position is supported by Mr Davis in his evidence. This occasional exposure of the wall has been assessed in my LVA report and in my conclusions.
- 5.10 I note the Council Coastal Engineer's recommendation to move the southern end of the wall back to the boundaries in part to minimise what he considers will be an adverse "end wall" effect, namely scouring of the land to the south that is part of the DOC reserve. In response to the risk of erosion within the reserve, the Council Ecologists recommends that the applicant should instigate and maintain a spinifex planting programme for

a minimum of 100 metres southwards of the new structure if it is subject to any indication of increased rates of erosion relative to the new structure.

- 5.11 In response to the Council recommendations, Mr Davis has estimated the scour is likely to be in the order of 2-5m landward and 5-15 [metres shore-parallel] based on observation of similar erosion during Cyclone Gabrielle and only likely to occur once the adjacent shoreline has retreated behind the crest of the rock wall by 2-5m. Mr Davis also finds that the scour of the reserve will only occur when there is significant storm damage to the whole dune front to the reserve and the entire dune front, including the scour area will tend to repair by natural processes as part of natural dune building during calmer periods.
- 5.12 Based on Mr Davis' estimate of the potentially disturbed area, Mr Keesing observes that the vegetation in the area is not an indigenous representative coastal indigenous dune assemblage and that it has low value and is readily responsive to disturbance, rebounding rapidly following disturbance. Mr Keesing also finds that if this limited area had exacerbated erosion because of a buried sea wall end then that impact spatially and in terms of lost value would be negligible to low, and the erosion area would naturally rapidly return. I note the observation of Mr Davis that should such scouring occur then it would be likely to be due to significant storm damage to the whole dune front to the reserve. Such an event would lead to considerable erosion across the dune frontage to the reserve.
- 5.13 Based on Mr Davis' and Mr Keesing's evidence, I consider that due to the very limited area of likely disturbance to the south of the site due to the "end wall" effect and the low ecological value of the vegetation assemblage in the area and its' ability to naturally recover, that the natural character and landscape effects of such erosion within the reserve would be negligible, if detectable at all.

- 5.14 Both Mr Gumbley and the Council Planner conclude that the landscape, natural and visual character effects can be adequately mitigated through the conditions of consent to ensure the effects will be less than minor¹⁴.
- 5.15 I have also read the relevant sections of the Coastal Engineering Review attached to the Section 42A Report. I note in the conclusions that the Coastal Engineering Review recommends that the south end of the coastal protection structure (the Type 1 section) adjacent to 12 – 16 Glen Isla Place should be constructed on the boundary of the properties in this location, not off-set from the property boundaries, as located in the application. The Coastal Engineering Review also recommends that the north end of the structure could be shortened, behind the Three Mile Creek Groynes. It does not appear that Mr Gumbley has considered this option as part of his review.
- 5.16 Overall, I consider that the proposal as set out in the application of a 5 metre off set from the property boundaries is preferable for the reasons set out in my conclusions, however, if the Commissioners were minded to consent the protection structure in a different location, subject to conditions, then I have assessed the option proposed by the Coastal Engineering Review below.
- 5.17 Having discussed the Council Engineer's proposed option with the Applicant and their Engineer (Mr Davis), the construction of the structure on the property boundaries would lead to the removal of any potential future public access along the back of the wall, should it be exposed by coastal erosion. Therefore, an in-between option of anywhere between the 5m off set at the south end and a reduced off set of 1.5m would be an acceptable outcome from a landscape, natural character and visual effects perspective. The location of the structure closer to the property

¹⁴ Paragraph 193 of the Section 42A Report.

boundaries, up to 1.5m from the boundary, would lead to the following subtle differences in my effects conclusions:

- i. **Natural character effects** - would be largely unchanged as the retreat of the wall would allow natural erosion to continue over a wider area of the dune profile until it interacted with the structure of which the time scale would be longer if it was further from the current CMA boundary. This would lead to reduced interruption to natural processes. Balancing the continued natural processes is the reduced overall dune area for the replenishment of sand and coastal dune species. On balance the natural character effects would be **Moderate-positive (vs Moderate-high positive under the current proposal)**.
- ii. **Landscape effects** would be slightly reduced from high – positive as a reduced dune area would be available to provide a buffer between the property boundaries and the active erosion zone at the back of the beach. As noted above the potential for physically protected public access behind the wall would also be reduced. Landscape effects would be **Moderate-high – positive (vs High positive under the current proposal)**,
- iii. **Visual Amenity** effects would be largely unchanged as the back of the beach would continue to erode, appearing natural, but the continued erosion of the natural dune and exposed sand would be off-set by the less regular and/or slower exposure of the structure. Visual amenity effects would be as assessed for the original application.
- iv. **Construction effects** would be similar to the effects for the application, assuming that the wall would be of similar design and scale, just relocated towards the property boundaries at the southern end. One change to the construction effects is the difference in the location of the construction footprint. While the

construction footprint of the structure might be different, the footprint would be the same size and therefore the construction effects of the project would remain **low – adverse**, and temporary.

- 5.18 I have noted some subtle differences in my effects conclusions which overall are immaterial to my final conclusions on the appropriateness of the original proposal. Overall, I consider the application version to be preferable in natural character, landscape and visual effects.

6. RESPONSE TO SUBMISSIONS

- 6.1 Thirteen submissions¹⁵ were received on natural character, landscape and visual amenity matters, opposing the proposal. Several submissions were from multiple people. In relation to the proposed alternative location assessed above, that proposal does not alter my response to the submissions below.

- 6.2 Key themes from the submissions are:

- > **Character and visual amenity:** Submissions consider that effects will be adverse rather than positive;
- > **Cumulative effects:** Submissions consider the proposal will further adversely impact character and amenity values at Waihi Beach (with values already compromised by existing rock revetment north of the site);
- > **Public access along the beach:** There is a concern that the structure will prevent access along the beach at high-tide or during storm events; and
- > **Use of public land for private purposes:** Submissions consider the “privatisation” of the dune will adversely impact the importance of dunes / reserves for the community.

- 6.3 In general the submissions disagree with my opinions on effects. I will respond to the themes of the submissions and will provide a summary in

¹⁵ Submission #12 (R McConnochie); #13 (N and J Goodhue); #14 (Dot Watch Waihi Beach); #15 (R and M Goodhue); #16 (Waihi Beach Environmental Society); #17 (Jennifer Thompson); #19 (Mark Moynihan); #20 (Tauranga Forest and Bird); #23 (Katikati Waihi Beach Ratepayers Association); #24 (Department of Conservation); #25 (Robert Gillespie); #26 (Janmerilai Wingate); and #29 (Helen Meiklejohn).

relation to the effects ratings and the reasons for coming to those conclusions.

Character and visual amenity

- > *Key submitter concerns: The use of rock will be inconsistent with the natural dune system and will impact the landscape and character of the coastal line once exposed.*

- 6.4 Rock revetment, when visible, will be integrated into and seen together with new indigenous planting to the north of and above the rock. Rock revetment walls are present along the back of Waihi Beach to the north of Three Mile Creek to protect residential development from ongoing coastal erosion. Large stretches of the existing rock revetment north of the site are not integrated into planting, as is proposed at the site. The site of the proposal includes sufficient depth, particularly at the north end to ensure that initially and subject to further accretion of sand following storm events, the rock revetment wall will largely remain buried by sand. The proposed planting at the Glen Isla dune will provide an improved visual amenity and character when compared with the exposed rock revetment walls to the north.
- 6.5 Left without the protection of the proposed structure, further erosion would lead to the exposure of underlying historical coastal protection works as illustrated in the photographs in the Graphic Attachments (Page 6) to the LVA taken after Cyclone Gabrielle in 2023 and eventually the property boundary fences and the properties themselves. The construction of a carefully designed structure, with the associated sand placement and planting is a better outcome for the amenity of the beach users and neighbours than the continued erosion of the dune system.
- 6.6 In my opinion the proposal is appropriate as it provides protection of landscape and natural character values of the beach environment at Waihi Beach and the protection of the Glen Isla Place residences, consistent

with the beneficial protection provided to other residential land north of the Three Mile Creek mouth.

Cumulative effects

- > *Key submitter concerns: The use of hard structures which become exposed over time will contribute to the already impacted amenity and character values of Waihi Beach (with values already adversely impacted by existing rock walls to the north of the site).*

6.7 The proposal will, in time, result in a further area of rock wall visible at the coastal edge along Waihi Beach. The design and location of the protection structure is similar in character to other coastal protection structures at Waihi Beach. In my opinion the cumulative effect of the exposure of the south end of the wall will not be adverse because:

- > At completion the proposal will result in improved natural character and visual amenity outcomes at the Glen Isla dune compared to the existing environment, through providing a naturalised dune form with more extensive indigenous coastal planting than currently exists;
- > Any part of the proposed structure that becomes exposed over time will be visually consistent with existing rock walls at Waihi Beach and will provide better natural character and visual amenity outcomes than areas of existing rock revetment wall to the north of the site, through the integration of mitigation proposals (e.g. the design and location to ensure most of the structure remains buried within a naturalised dune form, and the exposed parts are designed to support natural sand accretion and dune rehabilitation following storm events);
- > The Glen Isla dune structure is discrete in location and scale in comparison to other coastal protection structures already in place and in relation to the overall scale and length of the beach;
- > The proposal will protect landscape values associated with the potential for public access through ONF S24 at Three Mile Creek Reserve at the Glen Isla dune (protecting the residual dune behind the wall); and

- > The alternative scenario (to the proposal) is the eventual loss of reserve land, loss of (existing) indigenous planting, and an eroded coastal edge exposing historic coastal protection structures and eventually the adjacent residential properties.

Public access

- > *Key submitter concerns: Access to the coast is impacted both now and in the future. When the rock wall is exposed it creates a barrier to those walking along the coast or trying to pass the area in a high tide / storm event. No mitigation has been proposed to address this.*

6.8 The proposed structure will not be located inside the Coastal Marine Area (“CMA”). Coastal engineers for the project have advised this will mean that the proposed structure will not cause the same access issues which have been occurring to the north of Three Mile Creek, at the existing rock revetments at the coastal frontage of Shaw Road and The Loop. Rock revetment in these areas are located inside the CMA.

6.9 In the longer term, the continued erosion of the Glen Island dune back to property boundaries could lead to a lowering of the beach profile and no high tide access along the beach. The protection structure is design to protect the dune behind it, providing the potential for future access, if required.

Use of public land for private purposes

- > *Key submitter concern: Privatisation of the dune impacts the importance of dunes / reserves for the community.*

6.10 The proposed structure will protect the public reserve land behind the structure. The proposed structure will therefore protect the potential for public access adjacent to the beach through Three Mile Creek Reserve, should that be needed in the future due to reduced access on the beach as a result of climate change. The structure will protect Council reserve land and dune vegetation and with the structure being vested in Council, the ongoing protection of the reserve for public use will be provided via private

funding. If the proposal was on the property boundary or inside the adjacent private properties, then erosion back to the wall would remove all high tide public access along the beach and the reserve land back to the property boundaries. For these reasons, I consider the protection structure will protect landscape values at the site for the wider public, rather than reduce values.

- 6.11 The proposal is consistent with the protection provided to other residential land north of the Three Mile Creek mouth which is in reserve land and is also in the CMA. Rock revetment walls have been constructed inside reserve land at the frontage of Shaw Road and The Loop by the District Council.

Disagreement on effects conclusions

- 6.12 There are themes from the District Council's landscape advisor and in the submissions indicating disagreement with the effects conclusions from the LVA, particularly regarding positive natural character, landscape and visual amenity effects. The landscape advisor and the submitters appear to start their assessment from the point of view that any change in the landscape must lead to adverse effects.
- 6.13 Te Tangi a te Manu¹⁶ outlines what landscape effects are in relation to inevitable changes in the landscape:

A landscape effect is an outcome for a landscape value.

While effects are consequences of changes to the physical environment, they are the outcomes for a landscape's values that are derived from each of its' physical, associative and perceptual dimensions.

¹⁶

Te Tangi a te Manu, Aotearoa New Zealand Landscape Assessment Guidelines. 2022. Page 135.

Change itself is not an effect: landscapes change constantly. It is the implications of change for a landscape's values that is the effect.

- 6.14 The landscape at Waihi Beach is continually changing. The effect of the sea on the coastal edge is particularly dynamic, especially during high energy storms and is being exacerbated by climate change (including more frequent storms and sea level rise). The need to plan and construct erosion protection works is a direct response to the increasing amount of erosion that is being experienced on the coastal edge and the need to protect public and private land from the effects of erosion. Coastal protection structures are becoming common in areas where there is insufficient coastal dune to absorb the increasing energy of coastal erosion forces due to the presence of historic development. Such structures are becoming increasingly common in low lying coastal areas in the Bay of Plenty, including at Waihi Beach. As shown in the photographs in the Graphic Attachments in the LVA and in the second s92 response, such efforts are not new. If left unprotected then the landscape, natural character and visual effects of allowing the erosion to claim properties could be far worse than the construction of the protection structures themselves as properties and their structures are eroded into the sea, as has happened at some other exposed coastal settlements, such as Haumoana in Hawke's Bay.
- 6.15 The construction of the coastal protection structure is in an area that has been disturbed by historic efforts to provide coastal protection¹⁷ and the existing landscape and natural values of the site are not high, even if it happens to be captured within a generic outstanding landscape feature which captures land along Waihi Beach within 100m of MHWS¹⁸ (ONF S24). The construction of the structure will allow for the implementation of mitigation efforts including burying the wall with sand and ecological

¹⁷ See the response to the second s92 request for further information.

¹⁸ Mean High Water Springs.

enhancement planting, which will improve the existing and potential future landscape and natural character values at the back of the beach.

- 6.16 In the specific circumstances of this proposal and in this location, it is my opinion that the construction of the coastal protection structure will have positive effects on the landscape, natural character and visual amenity values of the site and the adjacent Waihi Beach.

7. CONCLUSIONS

- 7.1 I have summarised my conclusions on natural character, landscape and visual amenity effects in the summary above. My assessment and conclusions with respect to these effects has not changed following the consideration of submissions and the landscape evidence provided with the Section 42A Report.
- 7.2 In relation to the Coastal Engineering Review recommendation accompanying the Section 42A Report, to locate the protection structure closer to the property boundaries, I have considered that recommendation, with subtle changes to my effects conclusions and have concluded that overall the application version, being located at 5m off the property boundary, is preferable in natural character, landscape and visual amenity terms.
- 7.3 I note that both Mr Gumbley and the Council Planner conclude via the Section 42A Report that the landscape, natural and visual character effects can be adequately mitigated through the conditions of consent to ensure the effects will be less than minor¹⁹. I agree that the effects will be less than minor but do not support the need for sand replenishment or other top up requirements as natural processes will provide accretion, as evidenced since the 2023 storm events.
- 7.4 Overall, I consider that while parts of the structure are likely to become exposed over time, the design approach is to protect landscape and

¹⁹ Paragraph 193 of the Section 42A Report.

natural character values of the beach environment at Waihi Beach **and** to protect the reserve land and Glen Isla Place residences, consistent with the protection provided to other residential land north of the Three Mile Creek mouth. The proposal can lead to positive landscape and natural character effects overall.

Brad Coombs

Principal Landscape Architect

Isthmus

25 July 2025

APPENDIX A: LVA APPROACH AND METHODOLOGY

The following sets out the approach and methodology used in this assessment of effects.

Approach

Natural Character

Refer below to “Definitions”, for the definition of natural character used in this assessment.

This assessment considers that natural character is a “type” of character, contributing to the overall landscape character of an area. Natural features (such as vegetation or natural landforms) and the qualities and characteristics they include contribute to both the natural character and landscape character of an area.

Assessment of effects from the proposal on existing natural features (such as vegetation and natural landforms) is provided in this report under the heading of natural character and is not considered again within the assessment of landscape effects. This is to avoid repetition and assessment ‘double up’ in effects ratings (i.e. effects on natural landscape and natural features are considered once, rather than under both headings of Natural Character, and Landscape).²⁰

Natural character includes both natural science matters and perceptual matters.²¹ As such, effects on ecology and habitat will contribute to overall natural character effects. The effects ratings in this assessment include consideration of findings from ecology specialists,²² to reach a conclusion on the overall level of natural character effects from the proposal.

Landscape

The assessment of landscape effects in this report focuses on effects on urban aspects of the landscape. Effects on natural landscape and features are considered

²⁰ Te Tangi a te Manu, the NZILA landscape assessment guidelines, (2022), outline that assessment methodology should be tailored to the needs of each assessment. The approach for this assessment recognises that at this site landscape character is closely linked to natural character, and is adopted to avoid “double-counting” of effects on existing natural features (such as vegetation).

under the heading of Natural character (for the reasons outlined above, under the heading Natural Character).

For this site, potential landscape effects will relate to public access to/along the coastal edge.

Visual Amenity

The assessment of visual amenity effects considers effects on both natural character (including the natural landscape) and urban landscape, as both aspects of landscape contribute to the views and features that people value.

Cultural matters

Cultural landscape values relating to the project area are part of overall landscape values.²³ We note that as landscape architects, we are unable to assess cultural values without input from mana whenua.

Construction (temporary effects)

These are considered as temporary effects arising from construction activities and the establishment of temporary works or storage areas and not present at the end of the construction period.²⁴

Assessment Methodology

The methodology used to consider potential natural character, landscape, visual amenity and construction effects of the proposal has followed best practice guidance set out in Te Tangi a te Manu, and has included the following:

²¹ As outlined in Te Tangi a te Manu, the Aotearoa New Zealand Landscape Assessment Guidelines (2022) adopted by Tuia Pito Ora, the New Zealand Institute of Landscape Architects (NZILA).

²² This is in line with best practice as outlined in Te Tangi a te Manu, the landscape assessment guidelines provided by Tuia Pito Ora, the New Zealand Institute of Landscape Architects.

²³ As outlined in Te Tangi a te Manu, the assessment guidelines provided by Tuia Pito Ora, the New Zealand Institute of Landscape Architects (NZILA).

²⁴ Where the duration of an effect extends beyond the construction period, that is considered under the assessment of natural character, landscape or visual amenity effects (as appropriate).

- > Review of the proposal plans and documents, including relevant planning provisions;²⁵
- > A desk-top evaluation of the proposal's visual catchment, including identification of the locations and audiences likely to gain views of the site and proposal;
- > Site visits to understand the site and context, and the visual catchment. Photos were taken (from publicly accessible locations), to understand views of the proposal likely to be gained by surrounding audiences;
- > Evaluation of the site and context, including consideration of the existing levels of natural character and the characteristics and qualities which contribute to that;
- > An outline of the proposal and identification of components likely to generate long-term/permanent and temporary natural character, landscape and visual effects;
- > An assessment of the effects of the proposal on the existing natural character, landscape and visual amenity at the site (including effects on the immediate surrounding context);
- > An assessment of the temporary effects on natural character, landscape and visual amenity effects from construction of the proposal (temporary effects from temporary work areas and activities); and
- > Recommendations and Conclusions.

In line with the NZILA assessment recommended best practice methodology, a 7-point scale (as set out below) has been used to rate the effects:

Very Low / Low / Moderate-Low / Moderate / Moderate-High / High / Very High

Effects relate to both nature and extent – that is, qualitative matters. The 7-point scale is used to provide a summary rating of effect, as a useful tool of analysis. For the purpose of decision making and to confirm appropriate mitigation recommendations, the ratings provided need to be considered alongside the qualitative description of the effects.

²⁵ As provided by Mitchell Daysh, the project planning team.

Effects may be adverse, neutral, or positive.

Definitions & Explanations – Te Tangi a te Manu

This assessment uses the following definitions/explanations of **natural character** and **landscape**, taken from Te Tangi a Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (July 2022), as recently updated by Tuia Pito Ora, New Zealand Institute of Landscape Architects (NZILA):

Natural Character

“Natural character is the distinct combination of an area’s natural characteristics and qualities, including degree of naturalness.”

“Natural character is an outcome of physical environment and perception. Perception is influenced by what we know of an area’s natural characteristics and qualities (including input from natural sciences) and how we experience them.”

Naturalness

“Naturalness” is a measure of the actual and apparent modification from a fully natural state.”

Natural character is a type of character – the distinct combination of an area’s natural characteristics and qualities. Naturalness is an attribute of that natural character.

As a measure of the extent of modification present, *naturalness* is quantitative.

As a distinct combination of natural characteristics and qualities, (including naturalness), the consideration of natural *character* is qualitative.

This assessment considers the specific character coming out of the combination of characteristics and qualities (biophysical and perceptual), including the naturalness/degree of modification in the area.

Landscape

*“Landscape embodies the relationship between people and place.
It is the character of an area, how the area is experienced and
perceived, and the meanings associated with it.”*

Landscape is an integrating concept. While landscape draws strands from diverse sources (natural sciences, humanities, cultural perspectives), it is perceived and experienced as a unified phenomenon. It is an integrated whole. It is more than a summary of data – the whole is greater than the sum of the parts.

Landscapes have physical, associative, and perceptual dimensions.

Amenity Values

The RMA defines “amenity values” as “those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.”

NZILA Ratings Scale

The 7-point rating scale recommended by Tuia Pito Ora, the New Zealand Institute of Landscape Architects, is as follows:

Very Low / Low / Low-Moderate / Moderate / Moderate-High / High / Very High

The scale is used to assess the existing levels of naturalness in an area (refer above to Natural Character), as part of a natural character assessment.

It is also used to rate effects on landscape values from development proposals.

Effects can be adverse, neutral, or positive.

The following provides a comparison of the relationship between the NZILA 7-point rating scale, and RMA terminology, as set out in the NZILA assessment guidelines, Te Tangi a te Manu:

			SIGNIFICANT			
LESS THAN MINOR	MINOR		MORE THAN MINOR			
VERY LOW	LOW	LOW-MOD	MODERATE	MOD-HIGH	HIGH	VERY HIGH

APPENDIX B: KEY (RELEVANT) STATUTORY PROVISIONS

Resource Management Act

Section 6 Matters of national importance

Use and development shall recognise and provide for the following matters of national importance:

(a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:

(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:

(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:

Section 7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

(c) the maintenance and enhancement of amenity values:

(d) intrinsic values of ecosystems:

(f) maintenance and enhancement of the quality of the environment:

New Zealand Coastal Policy Statement 2010

Objective 2

To preserve the natural character of the coastal environment and protect natural features and landscape values through:

- > recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution;

- > identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and encouraging restoration of the coastal environment.

Policy 6 Activities in the coastal environment

- (1) In relation to the coastal environment:
 - (i) set back development from the coastal marine area and other water bodies, where practicable and reasonable, to protect the natural character, open space, public access and amenity values of the coastal environment; and

Policy 13 Preservation of natural character

- (1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:
 - (a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and
 - (b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment;

Policy 15 Natural features and natural landscapes

To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:

- (a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and
- (b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;

Bay of Plenty Regional Policy Statement (“RPS”)

The RPS includes criteria for the identification and assessment of values of significance, and objectives and policies relating to natural character, and natural features and landscapes.

- > Appendix F relates to criteria for assessing matters of national importance in the Bay of Plenty, including natural character, and natural features and landscapes.
- > Appendix I identifies and Appendix J describes areas of Outstanding, Very High or High Natural Character. The site is not within any of these identified areas.

Bay of Plenty Regional Natural Resources Plan ("Regional Plan")

- > Under the Regional Plan the proposed structure (inside the reserve land) is located in "Sand Dune Country" and "Erosion Hazard Zone".

Bay of Plenty Regional Coastal Environment Plan ("Coastal Plan")

- > Under the Coastal Plan the site (and the adjacent private properties on Glen Isla Place) are located within the "Coastal Environment".
- > The site falls within Indigenous Biological Diversity Area B.45
- > The site is not identified within an Outstanding Natural Landscape or Feature ("ONFL") under the Coastal Plan.

Western Bay of Plenty Operative District Plan ("District Plan")

- > An Outstanding Natural Feature ("ONF") is identified over the site (and other parts of the coastal edge along Waihi Beach) in the District Plan. This is ONF S24 Open Coastal Landscape Landward Edge Protection Yard. The District Plan identifies that the ONF contains "all land adjoining the open coastline, zoned Rural and within 100m of MHWS". No other specific characteristics or values are identified in the District Plan for the ONF.
- > The site is located in Council Reserve/Esplanade Reserve in the District Plan, which is zoned Rural. The adjacent properties on Glen Isla Place are located in the Residential Zone.
- > The site and adjacent Glen Isla Place residences are identified as being in Coastal Erosion Areas, and partly within with the Coastal Inundation Area.
- > The site forms part of a Local Purpose Esplanade and Recreation Reserve (Three Mile Creek) under the District Plan.

Three Mile Creek Reserve Management Plan

- > The Reserve Management Plan for Three Mile Creek includes policies to manage the recreation reserve, including in relation to maintenance of coastal protection structures, coastal access and neighbourhood recreation; and relating to enhancing pedestrian linkage, and to “maintain enhancement and maintenance where public recreation, amenity and natural character values are not adversely affected”.