

Hearings Coordinator
Western Bay of Plenty
District Council

rcsubmissions@westernbay.govt.nz

7 August 2025

Christchurch Ōtautahi Office
161 Cashel Street

Private Bag 4715
doc.govt.nz

DOC-10401290

Dear Independent Hearing Panel,

Proposal by Glen Isla Protection Society Inc to construct a coastal protection structure at Waihi Beach

As previously advised, the Department of Conservation (the Department) is unable to attend the hearing for this proposal. However, having reviewed the Council Officer's s42A Report and the Applicant's Expert Evidence, the Department would like to provide further comments to address the alternative seawall location proposed by the Applicant, and the conditions recommended by the Council Officer to manage of effects on avifauna, lizards, and dunes.

Positioning of seawall

In his Expert Evidence Mr Fraser has advised that whilst the preference is for the southern end of the proposed seawall to be located 5 metres from the private boundaries, the Applicant would be willing to accept a location where the landward edge of the seawall at the southern end was moved closer to the private boundaries, though preferably at least 1.5 metres seaward.

The Department recognises the Applicant's efforts to address concerns raised in submissions by offering an alternative location for the southern end of the wall. However, the Department remains of the view that if the consent authority is minded to grant consent, the wall should be positioned further back on the Applicant's private property rather than within the reserve land. As detailed in the Department's submission, the proposed positioning of the wall on public land has the potential to reduce public access, inhibit general dune functions, and contribute to the loss of beach over time. The positioning of the wall on the Applicant's property would reduce these effects.

This submission is supported by the Coastal Engineering Review undertaken by Beca for Western Bay of Plenty District Council which states *"By locating the rock structure further back along the property boundary, the performance as a line of defence for the property is maintained, however the time taken for the structure to become exposed will be extended. This reduces the impact of the structure on the coastal processes, allowing the dunes and sand in front of the structure to absorb and naturally recover from storm events for a longer period before sea level rise reduces this capability, and reducing the 'end effects' expected at the southern end of the structure."*

The proposed location of a hard protection structure on public land where it is considered necessary to protect private assets and will not result in significant public or environmental benefits is also inconsistent with Policy 27 of the New Zealand Coastal Policy Statement 2010.

Avifauna, lizards, and ongoing dune management

The Department's submission sought that if the consent authority was minded to grant consent, suitable conditions be required to ensure potential adverse effects on indigenous biodiversity were avoided and to ensure that changes to the beach in front of and adjacent to the protection structure were managed for the life of the structure.

The Department considers that the conditions recommended in Section 10.0 of the *Updated Review of Ecological Effects and Submissions for a Proposed Seawall at Glen Isla Place, Waihi Beach Report* prepared by Wildland's for Western Bay of Plenty District Council are sufficient to address the concerns previously raised in relation to avifauna, lizards and the ongoing management of dunes.

Conclusion

I seek the consent authority **declines the application**, given the shortcoming outlined in the Department's submission have not been adequately addressed.

If the consent authority is minded to grant the application, the Department seeks that it impose the following requirements:

- a. The positioning of the wall on the applicant's private property rather than within the reserve land.
- b. The consent conditions recommended in Section 10.0 of the *Updated Review of Ecological Effects and Submissions for a Proposed Seawall at Glen Isla Place, Waihi Beach Report*, or those of similar effect, are imposed.

If you have any questions regarding this letter, in the first instance please contact Leah McEnhill at lmcenhill@doc.govt.nz.

Nāku noa, nā



Kristine Theiss