11 May 2021

Danielle Petrivich
Bay of Plenty Regional Council

Via email: Danielle.petricevich@boprc.govt.nz

Re: 340E Pāhoia Road, Pāhoia

Resource Consent for Coastal Wall

We write to you regarding the resource consent application on the land at 340E Pāhoia Road, Pāhoia. The resource consent seeks retrospective consent for an existing retaining wall at the above address.

Consent was lodged with the Bay of Plenty Regional Council in December 2019.

Since that time, the following has occurred:

1. The Bay of Plenty Regional Council has sought further information to understand the effects of the proposal. This is included and responded to in this letter below.
2. The land ownership has changed. The previous owner, Mactip Trust, has sold the land to new owners Peter and Patricia King. Peter and Patricia King have taken over the responsibility of this consent application, and accordingly seek to become the consent holders and applicant.
3. Ongoing engagement has occurred with Pirirākau regarding the coastal wall, to seek to obtain an outcome that Pirirākau can support.

Set out below is the information request from the Bay of Plenty Regional Council, along with the response to this request:

In order to understand the potential effects of the proposal on coastal processes (coastal inundation, coastal erosion, climate change and sea level rise), the following information is required:

a) An assessment of effects relating to sea level rise and climate change is required, taking into account the following:
   1. *The structure has not been designed to an engineered level. The recommended design level is the 1:100 year inundation level to 2120. This constitutes a 1% annual exceedance probability event (AEP) coupled with a 1.25 metre sea level rise, while taking into account climate change to 2130;*
   2. *For this site, based on NIWA's latest modelling, inundation will extend to 3.54 metres relative level (RL) as indicated in red on Figure 1 below;*
   3. *The 1.5 to 1.75m high (FL) wall height will only cater for spring tide elevations, with up to a 0.6 – 0.8m sea level rise, based on NIWA's modelling and would still be overtopped during large storm events. The infill placed behind the structure could for a source of sedimentation to the harbour;*

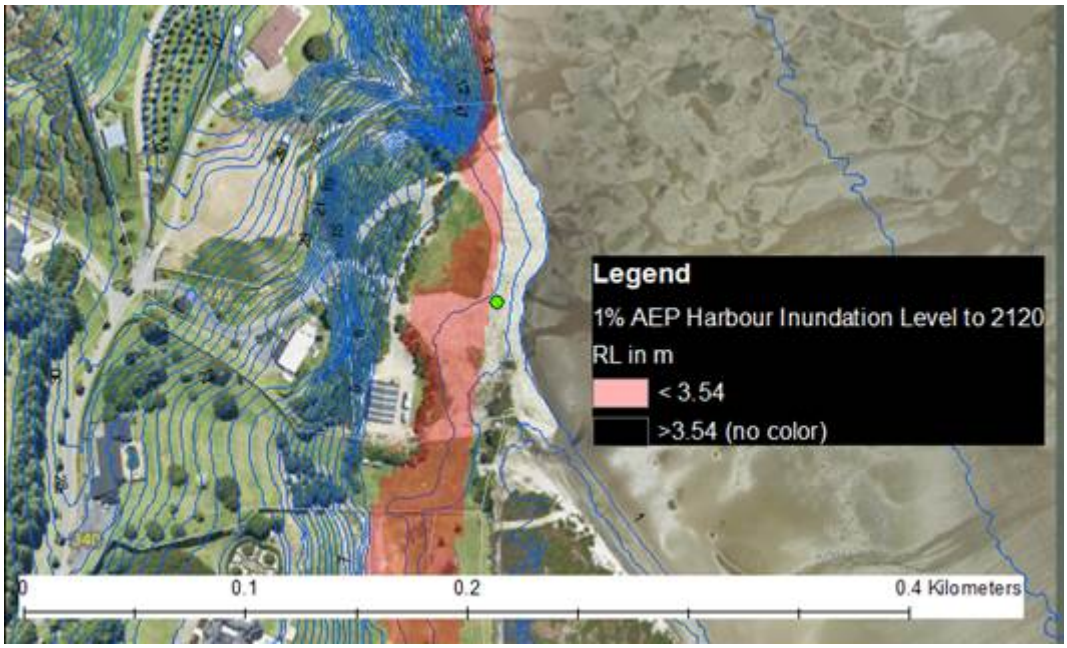

Figure 1. *NIWA modelling showing the extent of inundation at the site.*

4. *The finished design level of the seawall and confirmation of the appropriateness of the design in line with the projected coastal inundation and coastal erosion for the location should be submitted – specifically due to the infill behind the wall and the proximity of the high value area – Natural Character, Indigenous Biodiversity Area A, Tauranga Harbour.*
5. *A plan of the seawall with surveyed seawall heights should be provided (PVC seawall and additional new seawall).*
6. *Dimensions and details of the seawall and reclamation including the portions of the seawall and reclamation within the CMA and the portions of the seawall and reclamation outside the CMA.*

b) *Standard design cross sections should be provided of pile depths and sizes as well as concrete thickness/widths and relevant detail. This will form a record of the structure. This is a requirement of any coastal structure consent and would require the structure to be maintained to the same operational standard;*

c) *A management plan should be provided, including but not limited to,*
   1. *Maintenance requirements: maintenance of subsoil drains of the seawall backfill material. Increased fill height behind the wall could increase groundwater pressure on the structure if these drains are not maintained appropriately;*
   2. *Inspection and monitoring requirements;*
   3. *Managing effects of coastal processes on the structure and reclamation.*

Response:

The following information and reports are now complete, and provide a response to the information requested above:

Attachment A: Coastal Processes Impact Assessment by 4Sight
Attachment B: Retaining Wall Structural Assessment by Kirk Roberts
Attachment C: Landscape Plan and Management Plan for Mitigation by Wildlands
Attachment D: Pirirākau Assessment of Cultural Effects 2021

Summary of key points:

Coastal Processes Impact Assessment:

- The report provides a site specific understanding of the potential risks to the environment and the coastal processes of the existing wall.
- The report assesses the local coastal processes including tidal regime, extreme water levels including to 0.2% AEP and 1.6m SLR, wind climate, and wave climate.

- The report assesses that as the wall has been in place for over 12 years, that the local coastal processes have largely adjusted to its presence.
- A condition assessment should be undertaken in the future, to ensure the wall structure is performing.
- *The report concludes:*

  Given the majority of the seawall has been in place for approximately 12 years it is considered that the local coastal processes regime has largely adjusted to its presence. Further, the potential for any adverse effects is considered to be low due to:
  - *The relatively low energy coastal processes regime;*
  - *The design of the southern point of the structure; and*
  - *The resilience of the receiving environment.*

Retaining Wall Structural Assessment

- The structural integrity of the wall is acceptable.
- The durability of the timber wall is expected to exceed a life of 20+ years.
- The durability of the uPVC wall is expected to exceed a life of at least another 15 years.

Landscape Plan and Management Plan for Mitigation

- A planting concept plan has been developed to provide for mass planting of indigenous species of vegetation along the top of the retaining wall and back within the site.
- The planting plan will break up the visual impact of the retaining wall when viewed from the harbour.
- The planning plan includes low-growing sprawling species, as well as plant taupata and harakeke set back from the wall. Ste back further will be a mixture of pōhutukawa, ngaio, karo, and houpara. This will form a strip of 'coastal forest'.
- Together, the mass planting plan along the frontage of the property will provide in excess of 1,000 indigenous plants.
- In discussions with Pirirākau, there are minor modifications required to the planting plan, that will be implemented when it is actioned. These are noted in the conditions from Pirirākau.
- In discussions with the Western Bay of Plenty District Council, who hold an esplanade easement over the front 10m of the land, there is a requirement to maintain a clear path for pedestrians to walk along this frontage. This aligns with the feedback from Pirirākau.
- A planting programme of works is included within the concept, and the approach to planting has been worked in closely with Pirirākau to allow appropriate oversight and the sourcing of ecologically sourced indigenous species. These matters are addressed within the Pirirākau Assessment of Cultural Effects 2021.

Pirirākau Assessment of Cultural Effects 2021

- The Pirirākau Assessment of Cultural Effects considers the potential cultural effects of the resource consent for a retrospective seawall and the occupation of space within the coastal area and part of the coastal marine area.
- Pirirākau maintain a strong interest in this area with the nearest marae at Tawhitinui Marae, and Pirirākau have a long standing relationship with the Pāhoia peninsula centred on ancestral and historical connections.
- Site visits have been held with Pirirākau, Ngāti Te Wai and Ngāti Ranginui Iwi from 2019 through to 2021.
- At the request of Pirirākau, a Limited Archaeological Assessment Report was undertaken and prepared by Mishmash. The report is appended to the Assessment of Cultural Effects.
- The report concludes: *A site meeting was held on the 4th of March 2021 and agreements were reached for Pirirākau to support the retention of the existing seawall. The cultural value statements that are agreed and presented in red text of this assessment of cultural effects should be reflected as*

conditions of consent where practicable. Pirirākau support the application for retrospective resource consent on this basis.

- The full report with the outcomes agreed with Pirirākau are appended to this response.

Conclusion:

Please accept this complete response to the queries raised for this retrospective resource consent.

If you have any questions or would like to discuss the enclosed further, please don't hesitate to contact me on 027 569 7449.

Yours faithfully
Veros Property Services Limited

Morgan Jones
Managing Director