Level 2, 33 Totara Street
Mount Maunganui 3116
+64 3 477 7884

29 November 2024

Bay of Plenty Regional Council
Attn: Tracey Bowers, Senior Consents Planner
Via email: Tracey.Bowers@boprc.govt.nz

Kia ora Tracey

RE: RM24-0537-AP - GIPS Response to the BOPRC Request for Further Information

This letter sets out the response from the Glen Isla Protection Society (**"GIPS"**) to the further information matters identified in the Bay of Plenty Regional Council letter dated 29 October 2024. The responses are provided in the table below.

Also enclosed with this letter are the written approvals from the property owners of 9, 11, 12, 14, 15 and 16 Glen Isla Place.

By way of update, we are currently preparing a further information response for the Western Bay of Plenty District Council application. We will forward this response, for your information, when we submit it to the Council.

I trust the information in this response addresses the further information requests, however, if there are any outstanding matters please do not hesitate to get in touch.

Yours sincerely,

Luke Faithfull
Mitchell Daysh Limited
luke.faithfull@mitchelldaysh.co.nz

BOPRC Request	GIPS Response
1. An engineering assessment has identified that post-earthworks, the sand around the structure may settle and be subject to wind erosion, leading to depressions in the dune or a sand cover of less than 0.5 meters over the structure. Please propose appropriate methods to ensure the sand dune is maintained at the proposed level and contours until it stabilizes through settlement and vegetation establishment. This should describe the method and frequency of inspection, and method of replenishment if required.	Methods to manage risk of wind erosion immediately after earthworks are completed are described in Sections 4.2 and 4.10 of the Engineering Design Report and in Section 6.3 of the AEE. In summary, the disturbed areas are proposed to be planted with indigenous species and, where required, wind fences can be established and will be removed once disturbed areas have settled. It is noted that the existing dune environment is subject to these natural processes, and they will reach a natural point of stabilisation without intervention. Further to the information in the Engineering Design Report, The Project Engineer, Davis Coastal, has advised that 'stabilised' means that the planting is preventing erosion, within limits. For a beach / dune environment there will always be some sand blown erosion, however, with planting the sand deposited within the plant areas tends to exceed that removed. Any dune built over the seawall will be a natural dynamic system and will not require replenishment. The design provides for depressions in the dune and variable height sand cover are entirely consistent with a natural dune. The proposed 0.5m cover specified is cognisant that in some places there may be some settlement. The sand readily redistributes and Davis Coastal do not see any issue with there being less than 0.5m in the dune as time progresses. Indications from the site and monitoring is that the dunes will prograde and increase in depth and size naturally over time. This is evident in the new foredune area adjacent to the Three Mile Creek sand groynes that is being protected in the proposal, which is an area that has established itself since the storm events of Cyclone Gabrielle and Hale. In addition to the above, given the historic accretion and placement of dredged sand from Three Mile Creek adjacent to the works area, no additional sand replenishment is anticipated to be required. GIPS note that the Remediation Planting Plan, recommended as part of the Ecology Report, will include monitoring and, where required, replating of plants within the existing vegetated areas which die off. Further, upon completion of the replanting and the 'manage and maintain' period (GIPS accept a 60% coverage trigger or 2 year period of management of planting within the 'reinstatement areas'), the structure will be vested to Western Bay of Plenty DC Reserves Team and they will continue to provide for management and maintenance of the Three Mile Creek reserve area in which the structure is located. The Applicant agrees to the provision of a Remediation Planting Plan to be certified by Councils as a requirement of any consent conditions for the proposal. The proposed condition is as follows: ***Conditions for Remediation Planting Plan:*** *1. At least 20 working days prior to the commencement of any planting activities on site, the Consent Holder shall submit a Remediation Planting Plan ("RMP") to the Council (or relevant authority) for certification. The purpose of the RMP is to reinstate disturbed vegetation and preserve the ecological functioning of the Glen Isla dune environment. The RMP must be prepared by a suitably qualified and experienced ecologist and, as a minimum, include the following details:* *a. **Contact Person:** Identification of the suitably qualified and experienced ecologist who prepared the RMP and identification of the party who will oversee the replanting and the maintenance activities.*

BOPRC Request	GIPS Response
	b. ***Planting Layout:*** *A detailed planting plan that outlines the locations and density / spacing of the planting including identification of the 'reinstatement areas' and the 'landscape areas' (Refer to Advice Note below) to be planted.* c. ***Species Selection:*** *A list of native species to be used in the replanting of the areas, in accordance with the 'Revegetation Planting Mix' as identified in BlueGreen – Glen Isla Dune Coastal Protection Project – Ecological Assessment. Where practicable, plants shall be sourced from the same ecological district.* d. ***Timing:*** *A planting schedule indicating the start and finish of planting activities, considering seasonal variations and plant availability.* e. ***Methodology:*** *Details of site preparation and planting methods that are suitable for coastal dune conditions.* f. ***Maintenance:*** *A description of how, in consultation with a suitably qualified and experienced ecologist, the Consent Holder will 'manage and maintain' the 'reinstatement areas', until the earlier of:* g. *The date that, in the opinion of the suitably qualified and experienced ecologist, the reinstatement areas achieve 60% coverage; or* h. *The date two years after the completion of work.* *This should include the methods proposed to 'manage and maintain' (Refer to Advice Note) the 'reinstatement areas' plantings to ensure successful establishment of plantings, including monitoring, watering and weed control strategies.* ***Advice Note:*** *For the purpose of the RMP Condition:* 1. *'Reinstatement areas' means the disturbed areas of existing vegetation within the Glen Isla dune, as a result of the construction activity. Shown as 'reinstatement areas' on the planting plan (to be provided as part of the final RMP).* 2. *'Landscape area' means the area of further planting outside of the 'reinstatement areas' that will be planted, subject to there being sufficient substrate available following construction. The purpose of this landscape planting is to provide a naturalised appearance of the dune environment following the completion of the construction activity, this planting is beyond that which is required to address the ecological effects of the proposal therefore, this area is not subject to ongoing management beyond the initial planting activity. Shown as 'landscape area' on the planting plan (to be provided as part of the final RMP).* 3. *'manage and maintain' means:* a. *Managing pest plants and weeds within the 'reinstatement areas'; and* b. *Where plants have died off, replanting at 1 metre spacings or less:*

BOPRC Request		GIPS Response
		i. When the suitable plants are available for planting; and *ii. Provided relevant substrate (i.e., sand) is available to plant into.*
1.	Please describe suitable methods to mitigate adverse effects on avifauana from the proposed activity. An ecological assessment has identified that there are potential effects on avifauna from the proposed works and recommends that if works occur during the months of August-March, a pre-work inspection by a suitably qualified ecologist should be undertaken to ensure there are no breeding pairs of shorebirds within the work area. If a breeding pair is found works should be delayed until chicks have fledged.	Given the construction period is proposed to commence in April and take 4-6 months, it is unlikely that avifauna will choose to nest in the vicinity of the active works site due to the activity in that location. Therefore, when considering the proposed timing and where works will (and will not) occur, there ceases to be any real risk to avifauna from the proposal. If works continue into the breeding season, the Project Ecologist has recommended a pre works survey by a suitably qualified and experienced avian ecologist is undertaken to ensure no risk of nesting disturbance occurs. If nests are found in the vicinity of the active works footprint and works are to be continued, then that viability will depend on the distance works are from the nest/s. The Project Ecologist advised that it is common practice to set up a distance limit from nest barrier and ensure works are beyond that barrier (noise and physical disturbance can be governed in that way successfully depending on the species and location). While this demarcation limit is a viable and common construction option it will depend on what species and where a nest occurs. This would be at the discretion of the ecologist. Therefore, if works are to occur during the breeding season (August – March), GIPS accepts a condition requiring a pre-work inspection by a suitably qualified and experienced ecologist to be undertaken to ensure no risk of nesting disturbance of shorebirds within the active works area. Where nests are found, the Ecologist shall identify the necessary mitigation measures to ensure any adverse impacts on the species will be avoided. The mitigation measures identified must be implemented prior to the commencement of works in the vicinity of the nesting sites are determined by the Ecologist.
2.	Please describe suitable method to mitigate adverse effects on lizards from the proposed activity. The ecological assessment identified at there may be micro-habitats within the site that could be used by lizards, and recommends that a lizard management plan is prepared by a suitably qualified ecologist prior to works that includes a pre-work survey (noting that absence during a survey doesn't necessarily mean absence from the site), monitoring and relocation of individuals	As advised by the Project Ecologist, a pre survey for lizards should be abandoned in favour of a pre works, by hand, vegetation removal and woody debris transfer action with herpetologist. This is the approach recommended as a pre works survey may still be inconclusive and such a survey would (in the absence of any real probability of returning a high value conservation species) be an inefficient use of time and resource. Noting the recommendation from the Project Ecologist, GIPS accepts a condition requiring a suitably qualified ecologist to be present during the vegetation clearance (and woody material removal) to ensure, that in the event they are located, lizards are suitably managed (moved to the non-impacted areas of the wider dune environment).

BOPRC Request		GIPS Response
	disturbed during and vegetation removal. The plan shall include management of plague skinks.	
3.	Please propose suitable methods to mitigate the risk of pest plant species spread from on-site machinery. The ecological assessment highlights the risk of pest plant spread from on-site machinery. It recommends cleaning machinery before site arrival and before moving to another site. Machinery hygiene standards should be documented and implemented in accordance with the document identified at the following link 'Keep it Clean'.	As advised by the Project Ecologist, the suitable method is as stated ensuring machinery and plant material brought on site is clean of seed material etc. The Project Ecologist notes that it is more about advent of weeds in the plant soils brought onto site than machinery bringing material on to site as there will be no fill material imported to site. It is assumed that post planting, the 'reinstatement area' is maintained and that weeding occurs at that time and through the 'manage and maintain' period. Beyond that period, the site will be vested back to the District Council and any risk will be no different than is present now. GIPS accept a 'Keep it clean' condition for any construction machinery working within the dune area but consider it is not practicable or necessary to apply this to the vehicles used for rock deliveries as they will be outside of the dune area and on site for short durations. GIPS propose that it is included as a requirement of the Construction Management Plan (CMP) condition which would set out the CMP requirements including: > *Contact details of contractor* > *Final design plans* > *Final construction methodology and timing* > *Measures /methods to address:* > > *Erosion and dust discharges from the site.* > > *The risk of pest plant species spread from on-site machinery including cleaning machinery before site arrival and before moving to another site. Machinery hygiene standards should be documented and implemented in accordance with the document identified at the following link 'Keep it Clean'* > > *Details of the location of temporary storage of construction machinery onsite* > > *Any accidental oil / fuel spills on site.* > *Details of site monitoring requirements and inspection schedules* > *Details of how any complaints will be managed and recorded.*

BOPRC Request	GIPS Response
	> *Any other information required to demonstrate compliance with the consent conditions*
4. Please propose a method to mitigate the adverse effects on the IBDA-B from the invasion of pest plant and exotic species in the disturbed and freshly planted areas. The application describes that replanting the disturbed area of the dune will be in accordance with a planting plan, however the ecological assessment has identified the risk of pest plant species from the adjoining area spreading into the newly planted area. The planting plan is recommended to be carried out by a suitably qualified ecologist and to include a restoration plan of the entire dune area that includes the removal of exotic and pest plants and planting to ensure the dune vegetation is restored to indigenous dominance and mitigate the effects of the disturbance activity on the IBDA-B.	As set out in the response to Item #1 above, the planting within the 'reinstatement areas' will have a 'manage and maintain' period where weed species are managed (removed). Further, the Project Ecologist states that given the wide array of exotic species already present within the Glen Isla dune environment, the risk of a change in status is very low. In the long-term, even if the existing weeds were to spread into the revegetated native areas over time, the ecological outcome will still be better (greater indigenous dune species diversity and cover) than that is present within the Glen Isla dune environment today.