Tonkin+Taylor

11 March 2024
Job No: 1017346.3000

New Plymouth District Council
Private Bag 2025
84 Liardet Street
New Plymouth 4340

Attention: Nicola Laurenson

Dear Nicola

Weld Road Pathway and Ahu Ahu Bridge
New Plymouth District Council Informal Section 92 response (LUC23/48354)

Introduction

This letter provides a response to the informal section 92 further information request (ref: LUC23/48354) received from New Plymouth District Council (NPDC) dated 12 December 2023. Numbering and questions from NPDC are in italics as per the section 92 further information request, with Tonkin & Taylor Ltd's (T+T) response below each question.

Response

Planning

1 *In the absence of a cultural impact assessment, we would want to see evidence of hapu support to the proposal including a set of agreed conditions that would sufficiently mitigate any cultural effects to a less than minor level.*

2 *Statutory acknowledgement – evidence from Taranaki Iwi that the effects relating to the statutory acknowledgement are addressed to a sufficient level.*

Response: As noted in Section Error! Reference source not found. of the Weld Road Pathway and Ahu Ahu Bridge – Assessment of Effects on the Environment prepared by Tonkin + Taylor, dated 20 October 2023 (AEE), hapū have been working alongside NPDC to provide proposed conditions of consent. Once a proposed set of conditions has been finalised these will be provided to Council.

3 *Evidence of consultation with DoC.*

Response: DoC has been provided with further information on the project, including a project summary letter (attached in Appendix A). We are waiting to receive further communications from DoC. This information will be provided once available.

4 *Confirmation of the area of indigenous vegetation disturbance required for conservation activities and operation of a walking track and the bridge. Table 3.4 of the Ecological Report identifies that (for the pathway/revetment) in addition to 20m2 of dune related species, approximately 220 m2 of coastal treeland and grassland will be removed however this includes exotic species and the rule only relates to indigenous vegetation. For the bridge replacement*

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the report identifies that approx. 175m2 of mixed vegetation will be removed how much of this will be indigenous?

5 *In addition, the rule trigger in table 4.6 requests consent for the pathway only.*

Response [4 and 5]:

Revetment / shared pathway

- Total area (exotic and indigenous): Approx. 240 m^2.
- Total indigenous area impacted: Approx. 156 m^2 (mixed treeland/grassland/duneland) – we are unable to define this area for specific vegetation types as the exact area of treeland/shrubland being removed rather than trimmed has not been confirmed (as we await final construction plans) so we have provided an approximate estimate which should be refined when construction design is completed.

Ahu Ahu Bridge

- Total area (exotic and indigenous): Approx. 178 m^2.
- Total indigenous area impacted: Approx. 106 m^2 (consisting of approx. 90 m^2 of grassland/shrubland and some duneland vegetation, and approx. 16 m^2 of coastal treeland).

Regarding the rule trigger (ECO-R2) in Table 4.6 of the Weld Road Pathway and Ahu Ahu Bridge – Assessment of Effects on the Environment prepared by Tonkin + Taylor, dated 20 October 2023 (AEE), we advise that the calculations indicate that the rule will also be triggered for Ahu Ahu Bridge.

Closing remarks

Our responses refer to information provided in the resource consent application and address the questions raised in the section 92 request. We trust that there is now sufficient information available for you to continue processing the application.

Please do not hesitate to contact Zoe Anderson (zanderson@tonkintaylor.co.nz) if you require further clarification of any aspects of this letter. We look forward to receiving draft conditions for our review and comment in due course.

Yours sincerely,

Richard Reinen-Hamill
Project Director

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Appendix A DoC Project Summary Letter

21 February 2024 Project No. 1017346.3000R

Weld Road Coastal Revetment Pathway & Ahu Ahu Bridge Consent Application:

Project summary to inform DoC landowner approval

Please note: The following represents a brief and abridged summary of potential elements of interest to DoC. For a full assessment, it should be read alongside the relevant sections within the AEE report as well as the Ecological Report attached in Appendix F for further details. This summary does not substitute or replace the conclusions of the full AEE report and is intended only to provide context.

Proposal Overview

Shared pathway and revetment

- New Plymouth District Council (NPDC) proposes to construct a new rock revetment supporting a shared path around the base of the Weld Road Reserve headland, to provide alternative public access around the headland and protect the archaeological site of Hauranga Pā at Weld Road Reserve.
- The proposed structure consists of a rock armour revetment which is approximately 140 m long, with a 2 m wide concrete pathway formed on its crest. The revetment will have a width of approximately 12 m, although the lower part of the structure will be below the beach sand level as the toe will be keyed 1 m into the below lahar bedrock. Geotextile will be installed behind the rock armour.

Ahu Ahu Bridge

- NPDC also proposes to replace the bridge over Whenuariki Stream that was badly damaged in a storm event in 2022. The replacement bridge will connect to the proposed shared pathway on the western side of the Whenuariki Stream.
- Preliminary design for the replacement works includes increasing the bridge length (to approximately 21 metres) allowing the new abutments to be relocated approximately 1 m further inland on both ends of the bridge. The deck of the new bridge is proposed to be raised by approximately 0.7 m at the abutments. The new bridge deck will be flat while the original bridge had a sag of up to 0.8 m, therefore, the deck in the middle of the new bridge may be up to 1.5 m higher than the original.
- The new bridge deck height will require raised approaches to tie back into the car park (east end) and shared coastal pathway (west end).

Public Access

- The revetment provides an alternative route around the Weld Road foreshore. In addition to the existing fencing, it also helps to reduce public access across Hauranga Pā. Specifically, the proposed pathway helps to avoid further degradation of archaeological features caused by informal walking and cycling trails that have developed across the site.
- The proposed works will provide safe and convenient public access to and through the coastal environment and form part of the 10 km Ōākura Coastal Trail.

- The replacement of the previously well-utilised bridge over Whenuariki Stream will reconnect Lower Ahu Ahu Road to the Weld Road headland. The provision of the concrete pathway will allow walkers and dismounted cyclists to easily and safely navigate the area, including during high tide.

Ecological Context Overview

- Existing vegetation upon the site identified as highly modified and heavily disturbed- mix of exotic and native species. Provides habitat for several species, including the potential for lizards.
- Freshwater habitats identified as being of "high" ecological value, with Īnanga habitat likely to be upstream of the application site.
- Coastal environment of the site composed of largely unmodified habitats and resources for benthic species. However, this is an area which is highly disturbed by foot traffic and is accordingly considered as being of "moderate" value.
- This coastal area also provides potential habitat to a variety of coastal birds. Blue penguins/ kororā are likely to be occasionally present within the project site and surrounding area, and one potential penguin burrow was identified during a site visit.
- The entire site is highly dynamic, and the mouths of the Whenuariki Stream (to the east of the site) and Timaru Stream (to the west of the site) naturally fluctuate over time, rapidly removing or contributing sediment which can significantly influence the surrounding beach levels by several meters.

Anticipated Ecological Effects

Terrestrial vegetation

- Proposed removal of approximately 240 m^2 of mixed native/exotic treeland, grassland and dune land vegetation for the pathway construction. Removal/or trimming of approximately 28 m^2 of mixed native/exotic treeland, and removal of 150 m^2 grassland and shrubland and potentially some dune land vegetation is also proposed for the bridge replacement construction (70 m^2 on the western bridge side and 80 m^2 on the eastern).
- To minimise ecological effects, unnecessary vegetation clearance will be avoided and mitigated through:
    - Physical delineation of the footprint boundary as well as clear delineation of any vegetation to be retained.
    - Site management and appropriate construction methodology.
    - Replanting of lost vegetation with the same or similar species is also proposed following the completion of construction, where it is practicable to do so. Notably, NPDC in conjunction with hapū have prepared a Landscape Restoration and Planting Methodology, which is provided in Appendix 3 of the LVEA (Appendix H of the AEE).

Terrestrial fauna

- An Environmental Management Plan (EMP) is being prepared to manage to manage and mitigate potential effects. The EMP includes an Avifauna Management Plan (AMP), Penguin Management Plan (PMP) and Lizard Management Plan (LMP) contain a number of management measures to ensure adverse effects on terrestrial species are avoided or minimised. For example, the EMP includes scheduling of construction works outside of terrestrial bird breeding seasons (if practicable) alongside the implementation of appropriate discovery, management, and salvage responses.

- As lizards may be present within the project site, a Wildlife Act Authorisation (WAA) is required from DoC. This was submitted on 21 December 2023.

Freshwater

- The works for the shared pathway / revetment will take place in the foreshore of Weld Road beach and within the riparian zone of Whenuariki Stream. Additionally, the construction of Ahu Ahu Bridge will take place from the stream bank and from within the stream. Depending on the alignment if the stream at the time of the works, the active stream channel may need to be diverted using sandbags to ensure there is no encroachment into the area of works.
- Actual and potential effects on freshwater ecology include water and sediment effects, changes to hydraulic complexity, fish migration, and injury or mortality. Several measures are proposed avoid, remedy, and mitigate to manage these effects, including the preparation of the Erosion and Sediment Control Plan (ESCP) to minimise the discharge of sediment-laden water. The EMP shall also include a Freshwater Fish Management Plan (FFMP) to address finding, capturing and relocating of fish which may be required.
- Changes in hydraulic conditions are also part of riverine systems near coastal edges. It is expected that once specific construction activities cease (after approximately 6 weeks) and objects needed for construction, such as sandbags, are removed from within the Whenuariki Stream, this stream will naturally revert back to conditions similar to that occurring prior to construction activities.

Coastal

- Given the location of the works, the proposal has the potential to generate adverse effects on the surrounding coastal environment.
- To mitigate potential effects, clear limits on the extent of site works will be established to ensure impacts can be contained. Works are also anticipated to be scheduled to avoid coastal bird breeding and moulting seasons. As noted above, an AMP is proposed within the EMP to manage those bird species which are unable to self-relocate to surrounding undisrupted habitats.
- The construction methodology and proposed ESCP will minimise the discharge of sediment, such as by avoiding working when the tide is high.
- The proposed revetment pathway creates a permanent change in the surrounding substrate type of Weld Road Beach. However, the affected area is small compared to the available surrounding coastal habitat, resulting in an acceptable level of effect.

Ecological Conclusion

- The Assessment of Ecological Values and Effects (AEcE) provided as Appendix F of the AEE finds that the residual effects from the project after the proposed measures to avoid, remedy or mitigate are anticipated to be between Low and Very Low. Accordingly, the AEcE concludes that the proposed management measures adequately address the potential adverse effects on ecology at the site.
- Overall, based on the AEcE, availability of surrounding habitat, relatively short duration of construction works, and proposed management measures such as the EMP, the adverse effects of the proposed shared pathway / revetment and temporary bridge on terrestrial, freshwater, and coastal ecology is considered to be no more than minor.

Landscape and Visual Effects overview

- Temporary visual effects are anticipated during the construction period, with machinery and material stockpiles required for works impacting upon views of the site for users of the Weld Road Beach, reserve, and Ahu Ahu Road carpark. However, these effects will be limited to approximately 4-6 weeks.
- The shared pathway/ revetment will appear as a new, visibly man-made structure around the foreshore. In order to help manage adverse effects, the following mitigation measures are proposed:
    - The works are located at the very base of the headland with a generally low-profile (as seen in figure 5.1 of the AEE (or LVEA Appendix A- Visual Simulation)). The integrity of the headland including cliffs and vegetation will therefore remain and form a natural backdrop to the proposed structures.
    - The proposed revetment helps minimise erosion of the cliff and stream thereby maintaining the existing landscape character.
    - The structures will be constructed with sympathetic materials which blend into the natural environment (i.e., the revetment will primarily be made of locally sourced natural volcanic rocks and the pathway will be treated with black oxide for better integration into the environment).
- Regarding Ahu Ahu bridge, management measures include:
    - The bridge design being generally similar to the previously existing bridge with some additional structural height at the abutments and associated timber ramps up to the bridge.
    - The swing bridge design will also have a relatively light look and presence compared to solid bridge structures.
    - Use of sympathetic materials (a mix of timber and steel).
- NPDC in conjunction with hapū have prepared a Landscape Restoration and Planting Methodology, which is provided in Appendix 3 of the LVEA (Appendix H of the AEE). One of the central aims of this Methodology is to help mitigate landscape effects by maintaining a vegetated edge along the headland behind the shared path.