

5 August 2025  
Job No: 1098908

Gisborne District Council  
PO Box 747  
Gisborne 4040

Attention: Katrina Roos

Dear Katrina

## **Te Ara Tipuna Resource Consent Application Response to Request for Further Information**

Tonkin & Taylor Limited (*T+T*) have been engaged to assist the Te Ara Tipuna Charitable Trust (*Trust*) in relation to its resource consent application for land use consents, coastal permits and other consents (*Application*)<sup>1</sup> to construct, operate and maintain a recreational trail known as “Te Ara Tipuna” (*the Project*).

This letter is filed on behalf of the Trust to:

- Provide an update on the status of the Application;
- Summarise changes to the Application since notification; and
- Respond to the request for further information (*RFI*) from the Independent Hearing Commissioners (*Commissioners*), addressing the matters raised by the reporting planner and technical experts appointed to assist Gisborne District Council (*Council*).<sup>2</sup>

### **Update on the status of the Application**

The Trust and its technical experts have worked hard over the past few months to prepare a high quality response to the RFI. This process has led to refinements in the Application to clarify its nature and effect. As confirmed in the Trust’s letter dated 26 March 2025, the Trust decided to amend the Application to reduce the extent of the Project, to include only those parts of the Ara<sup>3</sup> (trail) that are located within the rohe boundaries of Ngati Porou – mai i Te Toka-a-Taiau ki Potikirua.

The reduction in the scope of the Arameans the Application now falls solely within the jurisdiction of the Gisborne District Council. As such, the resource consent applications for the Project made to Opōtiki District Council and Bay of Plenty Regional Council for the Project were formally withdrawn on 4 April 2025.

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<sup>1</sup> Reference: GDC: DL-2023-112074-00, LR-2023-112076-00, LL-2023-112077-00, LV-2023-112078-00

<sup>2</sup> Memorandum prepared by Katrina Roos dated 31 January 2025.

<sup>3</sup> Throughout this document, ‘Ara’ (capitalised) refers to the full 345km Te Ara Tipuna trail, while ‘ara’ (lowercase) refers to individual tracks within it.

## Summary of changes to the Application

Whilst preparing a response to the RFI, the Trust and its technical experts have undertaken considerable further work to provide more detail regarding the Project and to provide for revised design details with reduced environmental impacts.

Through this work, the Trust has made several amendments to the Application. In addition to reducing the scope and extent of the Project, these changes have also helped reduce the actual and potential adverse effects on the environment of the Application as notified.

These changes include:

- Reduction in the extent of the Ara from 500 kilometres between Gisborne and Opotiki to the now proposed 345 kilometres between Gisborne and Potaka;<sup>4</sup>
- Amendments to the alignment, predominantly in response to expert advice and feedback from NZTA in relation to safety matters. Some further amendments to the alignment were also identified on a site visit with experts to reduce potential landscape and ecological effects (for example, to use existing tracks and bridges where possible);
- Change in approach to waterbody crossings to provide for greater use of existing bridges, river crossings on foot, and construction of some new swing bridges and timber bridges where safety issues made use of existing crossing impracticable/unsafe;
- Removal of the waterbody crossing at Pakarae River; and
- Removal of huts and shelters from the Application, to reduce further the footprint of the Project and rely instead on existing infrastructure along the Ara route.

Generally, the above changes and the modifications to the concept alignment have not changed the directly affected land parcels from when the Application was originally notified. However, there are five areas of exception.

The following four realignments are areas where the Ara has been moved out of the road corridor based on expert advice and NZTA feedback in relation to safety:

- Segment 2: Uawa to Tokomaru km 93 to 94
- Segment 7: Waiapu km 153 to 154
- Segment 7: Waiapu km 154 to 158
- Segment 7: Waiapu km 163 to 164

The fifth area of realignment has been made to avoid extensive physical works through an area with a steep gradient. Following consultation with local landowners, a new more practical alignment has been proposed for this area:

- Segment 5: Hikurangi km 26 to 41

The Trust has undertaken analysis of the landholdings where the Ara concept alignment now traverses, that would not have been directly notified. The Trust's analysis has confirmed that all of these landholdings are already represented in the consenting process as, for each of these landholdings, a relevant landowner was originally on Council's list of parties to be directly notified (as they own another landholding) and/or they have made a submission, with the exception of one owner. The Trust has engaged with this owner (Heneriata (Poppy) Horomia-Kaiwai) to ensure no

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<sup>4</sup> This length is further reduced from the 356km length identified in the letter provided to the Independent Hearing Commissioners and Gisborne District Council, reflecting further amendments to the trail in response to feedback from the Trust's technical experts.

prejudice to this owner as a result of the realignment. Correspondence from Ms Horomia-Kaiwai is attached confirming that she does not wish to make a late submission.

## Response to the RFI

The Trust has taken the opportunity presented by the RFI to undertake a comprehensive review of the information provided to date and is pleased to provide the attached suite of documents.

These documents comprise:

- An updated Assessment of Effects on the Environment – Te Ara Tipuna Trail (Stage 1), Tonkin & Taylor Limited, dated August 2025;
- Appendices A to V to the AEE, all of which are either new documents or updated replacements of documents originally lodged, with the exception of the Recreation Assessment (Appendix O) and the Social Impact Assessment (Appendix P) which remain unchanged; and
- Tables responding to the planning, ecology and landscape related requests for information (outlining each of the individual requests for further information, and cross-references to the AEE and technical assessments).

In addition to incorporating information prepared in response to the RFI, these updated documents also reflect changes to the scope and extent of the Application since lodgement (including changes to the concept alignment, and formal amendments to the AEE and technical assessments to reflect that the Ara is for use by pedestrians only).

A key part of the RFI response is a 'Km by Km Tracker' (Tracker) which is attached to the AEE as Appendix D. The Tracker provides an estimate of the extent and type of works that will be undertaken, amongst other key information, for each individual km of the Ara. The Tracker was prepared to support independent effects assessments based on a conservative assessment of the indicative maximum nature and extent of the construction works and trail design anticipated within each km. This has enabled the planning and technical assessments to be based on a conservative maximum and means that they are likely to overstate the scale of any actual or potential effects.

Given the length of the Ara, final detailed design plans have not been prepared as this is neither practical nor necessary to assess the effects of the Project. The assessment undertaken by technical specialists has been based on indicative concept designs and information, and they have considered a conservative 'worst case scenario' based on an upper threshold envelope of effects including robust management measures that have been incorporated in proposed conditions of consent attached to the AEE as Appendix T.

The detailed design stage will enable reduction of effects from that assessed, as the final alignment of the Ara within the Standard Consent Corridor (50 m width) and the Sensitive Area Consent Corridor (100 m width) will be able to respond to location specific factors, for example to minimise vegetation clearance required.

It is expected that the detailed design stage will also result in an increase in the extent of the Ara that is wayfinding only (that is, unformed ara or existing formed track), requiring no physical works other than installation of intermittent wayfinding markers. The attached application documents assess the effects of the Ara based on the conservatively prepared Tracker attached in Appendix D, which concludes that 75% of the Ara will be wayfaring (with negligible effects if any on the environment). In reality, the Trust and its experts expect that a much higher proportion of wayfaring will be likely. However this conservative assessment methodology has been utilised to help ensure that the assessments undertaken by technical specialists consider a worst-case upper threshold envelope of effects.

## Conclusion

On behalf of the Trust, we wish to convey our appreciation to the Commissioners and Council for their patience over these past few months. We are confident that this response comprehensively addresses all of the matters raised in the RFI.

We look forward to progressing this application to Hearing in the week commencing 20 October 2025. Please do not hesitate to contact the undersigned if you have any queries.

Yours sincerely,



Jennifer Carvill  
Project Director

5-Aug-25

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## Attached:

Email correspondence from Heneriata Horomia-Kaiwai, dated 5 August 2025.

Further information request response tables.

Assessment of Effects on the Environment – Te Ara Tipuna Trail (Stage 1) (separate PDF).

Jennifer Carvill

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From: Rakaitemania Parata Gardiner <rakaitemania@tearatipuna.nz>  
Sent: Tuesday, 5 August 2025 3:42 pm  
To: Jennifer Carvill  
Cc: Haylee Minoprio; Portia Sutherland; Zoe Anderson  
Subject: Fw: Te Ara Tipuna updated alignment

Thank you to Ata for securing the below from Heneriata (Poppy) Horomia-Kaiwai



**Rakaitemania  
Parata Gardiner**

Team Leader

rakaitemania@tearatipuna.nz  
(027) 627 6943

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From: Ata Mangu <ata@tearatipuna.nz>  
Sent: Tuesday, August 5, 2025 3:40:16 PM  
To: TAT Project Team <projectteam@tearatipuna.nz>  
Subject: Fw: Te Ara Tipuna updated alignment



**Ata Mangu**

Project Co-ordinator

ata@tearatipuna.nz  
(027) 262 7806

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From: Poppy Horomia-Kaiwai <poppy@blackbeecontractors.co.nz>  
Sent: Tuesday, August 5, 2025 3:34 PM  
To: Ata Mangu <ata@tearatipuna.nz>  
Subject: RE: Te Ara Tipuna updated alignment

Kia Ora Ata,

Thanks heaps, for your time this morning –really appreciated the update and the opportunity to kōrero.

To confirm:

- Yes, I'm aware of the changes to the proposed alignment.
- And no, I don't wish to make a late submission on the resource consent application.

I understand that even if resource consent is granted, any development of the trail will still rely on working closely with landowners, including securing agreement through an easement process at a later stage.

Appreciate you keeping us in the loop – see you Sunday! :) #GoRua

**Nga Mihi,**  
**Poppy Horomia-Kaiwai**

**Administrative Manager**

027 968 5127

**H BLACKBEE CONTRACTORS LTD | H BLACKBEE CRUSHING LTD**

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[poppy@blackbeecontractors.co.nz](mailto:poppy@blackbeecontractors.co.nz)



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From: Ata Mangu <ata@tearatipuna.nz>  
Sent: Tuesday, 5 August 2025 10:58 am  
To: Poppy Horomia-Kaiwai <poppy@blackbeecontractors.co.nz>  
Subject: Te Ara Tipuna updated alignment

Hi Poppy,

Thanks heaps for your time this morning - really appreciate it!

Thanks also for confirming that you weren't formally notified. We had advised the Council to use the rating database to identify landowners and/or occupiers, but unfortunately that approach wasn't adopted, and some people were missed in the process. Hoi ano..

As discussed, here are a couple of screenshots showing where the Ara has been re-aligned for safety reasons, both for trail users and motorists.

The alignment was previously within the road corridor for the entirety of Kemp's Hill, but it's now proposed to shift slightly (around 4–5 metres away from the live lane, and onto your property, running alongside your fence line. It also proposes to make use of the old State Highway on Kemp's Hill.

The updated alignment also completely avoids the northern side of Kemp's Hill, which we all know is really unstable. As shown in Image 2, the proposed trail comes off the old road, carries on past the Fox's via an unformed legal road, before dropping down on to Mangaoporo Road.

Can you please confirm:

- That you're aware of these changes. Noting that even if resource consent is approved, it **does not** give Te Ara Tipuna the right to develop the trail. We'll still need to work with you and every other landowner along the 345km trail to seek landowner approval through an easement at a later stage.
- That you don't wish to make a late submission on the resource consent application.

Thank you again - see you Sunday 😊



**Ata Mangu**

Project Co-ordinator

[ata@tearatipuna.nz](mailto:ata@tearatipuna.nz)

(027) 262 7806

## TE ARA TIPUNA – RESOURCE CONSENT APPLICATION – FURTHER INFORMATION RESPONSE (PLANNING)

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
High-level proposal for the staging of trail construction into “management units” or stages to assist with structuring the conditions of consent. This would allow for a structured approach to both effects assessment and management.	The AEE has divided the Ara into eight ‘management units’ referred to as ‘segments’ as outlined in <b>Table 1.2</b> in <b>Section 1.7.2</b> .	Information for the kms included within each ‘segment’ is contained in the <b>Tracker (Appendix D)</b> .
Detail the estimated margin within which the trail location could be expected to move following a site-specific assessment and / or landowner engagement process. This would then become a baseline for assessing whether a variation is required –the “consented envelope”.	Consent corridor approach outlined in <b>Section 1.7.5</b> .	
Within and adjacent to the consented envelope, identify the particular values of each relevant segment of the trail, to enable an assessment of actual and potential effects on cultural values, ecology, wetlands, vegetation, indigenous biodiversity, coastal hazards, landscapes, amenity, natural character and natural features.	<b>Section 4</b> addresses these particular values for each segment of the Ara. These values as they apply to the Ara in general are addressed in <b>Section 2</b> .  Additionally, <b>Table 1.2</b> in <b>Section 1.7.2</b> outlines the ‘management units’ used in each of the technical reports to guide the reader in identifying the specific locations or areas along the Ara that have been assessed in each technical assessment. This can be used to identify where technical reports refer to particular values within each segment.	



Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
Detail what specific works are proposed with each different management unit (refer to first bullet point above), e.g. bridges, culverts, permanent pathway, wayfinding.	<b>Section 3</b> details the proposed works as they broadly apply across the Ara. <b>Section 4</b> details the specific works that are proposed within each segment of the Ara.	Outlined in the <b>Tracker, Waterbody Crossing spreadsheet (Appendix E)</b> and <b>draft Construction Management Plan (CMP) (Appendix F)</b> .
Detail if there are any proposed management units with particularly high values that would either need to be avoided altogether (no-go areas) or require a different type of structure or works methodology. These should be capable of being identified up front and conditioned (there may be some areas that the trail must avoid altogether, and conditions should provide for this, whereas other areas could be subject to restrictions on particular work types, or submission of a particular design or works methodology which would be certified).	<p><b>Section 1.7.5</b> outlines how the consent corridor, in particular the 'Sensitive Area Consent Corridor', will be implemented to avoid and minimise ecological or landscape effects as far as practicable.</p> <p>As outlined in <b>Section 5.2.1</b>, no works are proposed within 10 m of a natural inland wetland.</p> <p><b>Section 7</b> outlines how the proposed Ara concept alignment has been positioned taking into account the expert advice provided in the technical assessments.</p> <p>An iterative design process was undertaken to inform the concept alignment with input from ecology, landscape, geotechnical and coastal hazard experts to identify and avoid no-go areas.</p> <p>Addressed in <b>Proposed Conditions (Appendix T)</b>.</p>	<p>The <b>CMP</b> outlines restrictions for sensitive areas.</p> <p>The technical assessments provide a detailed analysis of areas within or adjacent to the proposed alignment that are sensitive or high risk in the context of the Ara and have identified whether a different type of structure or works methodology is required.</p>

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
An assessment against the objectives and policies of the relevant planning documents as this has not been provided. I note that particular attention should be paid to directive objectives and policies (e.g. 'avoid') as it is anticipated that this assessment would inform delineation of no-go areas.	Provided in <b>Section 8</b> and <b>Objectives and Policies (Appendix S)</b> .	N/A
An assessment against the Regional Policy Statements (RPS) for both regions.	Provided in <b>Section 8.4</b> and <b>Objectives and Policies (Appendix S)</b> .	N/A
An assessment against the New Zealand Coastal Policy Statement (NZCPS).	Provided in <b>Section 8.3.1</b> and <b>Objectives and Policies (Appendix S)</b> .	N/A
An assessment against the relevant Iwi Management Plans (affects Bay of Plenty only).	No longer relevant (the application is only within Te Tairāwhiti).	N/A
Mechanisms for ongoing administration of the trail, such as maintaining a trust or other suitable legal mechanism in perpetuity and a draft management operations plan for inspections, maintenance, weed control, litter collection, checking for inappropriate usage, toilet cleaning, and other matters.	Addressed in <b>Section 3.10</b> and <b>7.12</b> , and in <b>Proposed Conditions</b> .	Operational, administrative and maintenance requirements outlined in the <b>draft Operational and Maintenance Management Plan (OMMP) (Appendix G)</b> .

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
More information on the passport system and how this will be managed and enforced.	Addressed in <b>Section 3.13</b> and <b>7.12</b> , and in <b>Proposed Conditions</b> .	Outlined in the <b>OMMP</b> .
More information on the proposed taxi service and how this will be administered.	No longer relevant (taxi service is not proposed for Stage 1).	N/A
More information on provision of accommodation for through-walkers on marae.	This application does not seek to authorise accommodation at marae.	N/A
A series of PDF maps of the trail in addition to the interactive GIS mapping system, if required by the commissioners.	N/A	Provided in <b>PDF Ara Alignment Maps</b> .
In respect of coastal hazards, please provide the exact locations where the trail may be periodically inundated and provide alternative routes to avoid the hazard; AND include well-defined, designated and environmentally appropriate access pathways to beach where coastal sand dune ecosystems are involved.	Coastal Hazard Overlay areas, Areas Sensitive to Coastal Hazards and Flood Hazard Overlay areas are identified for each segment of the Ara in <b>Section 4</b> .  As outlined in <b>Section 7.3.4</b> , existing tracks at beach transitions are utilised where possible and pre-construction confirmatory ecological surveys will be undertaken in dune environments where new accessways need to be established.	The <b>Coastal Hazards Assessment (Appendix L)</b> identifies the following locations as areas of the Ara that may be periodically inundated: Makorori beach (Segment 1), north of Anaura Bay (Segment 2) and northern end of Tokomaru Bay (Segment 3). Alternative routes are not proposed.  The <b>CMP (Appendix F)</b> provides a cross section of dune crossings.  The <b>Ecological Impact Assessment (EcIA)</b> and <b>draft Ecological Survey and Management Plan Protocol ESMPP (Appendix H)</b> outlines measures to protect dune ecosystems and environments.
<b>River Crossing details:</b> More information is required on the type	Outlined in <b>Section 3.3</b> and <b>4</b> (for each segment).	Provided in the <b>Tracker</b> and <b>Waterbody Crossing spreadsheet</b> .

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
and design of crossings likely to be required to support the trail within management units as per below. Number of crossings at major rivers.		These can also be viewed on the <b>GIS map (Appendix C)</b> .
Number of any waterway crossings.	Outlined in <b>Section 3.3</b> and <b>4</b> (for each segment).	Provided in the <b>Tracker</b> and <b>Waterbody Crossing spreadsheet</b> . These can also be viewed on the <b>GIS map (Appendix C)</b> .
Location of crossings.	Outlined in <b>Section 4</b> (for each segment).	Provided in the <b>Tracker</b> and <b>Waterbody Crossing spreadsheet</b> . These can also be viewed on the <b>GIS map (Appendix C)</b> .
If the crossings are seaside of the State Highway or the other side.	N/A – Confirmed at the workshop with Council that this information was no longer required. This will be addressed at detailed design.	N/A
If the crossings are cantilevered to the existing bridges – proposed soffit levels.	N/A – No crossings will be cantilevered to existing bridges.	N/A
If the crossings are within the coastal marine area or the coastal environment.	Outlined in <b>Section 4</b> (for each segment).	Provided in the <b>Tracker</b> and can be viewed on the <b>GIS map (Appendix C)</b> .
If crossing falls under the coastal hazard zones.	There are a number of crossings on foot, utilising existing structures or where new structures are proposed within the Areas Sensitive to Coastal Hazards (ASCH) overlay.  Notably, there are new bridge structures proposed where the consent corridor is within the ASCH overlay for the following crossings:	Provided in the <b>Tracker</b> and can be viewed on the <b>GIS map (Appendix C)</b> .

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
	<p>Crossing No. 4 – Swing Bridge at Pouawa River (Segment 1) (km 13)</p> <p>Crossing No. 24 – Timber Boardwalk at Kaitawa Stream/Tolaga Bay Estuary (Segment 1) (km 48)</p> <p>Crossing No. 138 – Swing Bridge at Karakatuwhero River (Segment 8) (km 212)</p>	
If any of the crossings are within coastal high-risk areas.	There are four crossings within the high risk or extreme risk Coastal Hazard Overlays (Crossing No. 49, 50, 52 and 53 in Segment 3). These crossings are all either on foot or utilise an existing structure. No new bridge structures are proposed in these overlay areas.	Provided in the <b>Tracker</b> and can be viewed on the <b>GIS map (Appendix C)</b> .
If the crossings are within private property.	N/A - Confirmed at workshop with Council that this information is no longer required.	N/A

## TE ARA TIPUNA – RESOURCE CONSENT APPLICATION – FURTHER INFORMATION RESPONSE (ECOLOGY)

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<b>Proposed works:</b> (a) Detail on the staging and timing of works, as well as the estimated length of time over which works will be undertaken.	The works will be progressed in stages subject to obtaining landowner approvals, funding and resourcing. A 10-year lapse period has been sought. Outlined in <b>Section 1.6</b> . Addressed in <b>Proposed Conditions (Appendix T)</b> .	Provided in the <b>draft Construction Management Plan (CMP) (Appendix F)</b> .
(b) Detailed construction methodology as it applies to each stage, particularly with regard to the types of machinery that will be used, where, and how access will be achieved.	Outlined in <b>Section 3</b> .	Outlined in the <b>CMP</b> .
(c) The design of the track across the full length of each stage. This includes information regarding track width and materials used (i.e., boardwalk, concrete, limestone, or dirt track), and whether additional works will be required to construct access for ongoing maintenance.	Ara design outlined in <b>Section 3</b> (overall Ara) and <b>Section 3.14 (Table 3.2)</b> and <b>4</b> (for each segment). Operational and maintenance requirements outlined in <b>Section 3.13</b> . The <b>Proposed Conditions</b> require concept and detailed designs and set parameters that the design must comply with.	Ara track typologies outlined in <b>CMP</b> . Indicative concepts of ara cross sections, road crossing options, toilet blocks, steps, swing bridges and timber bridges are appended with the <b>CMP</b> . Maintenance requirements outlined in the <b>draft Operational and Maintenance Management Plan (OMMP) (Appendix G)</b> .
(d) Earthworks plans detailing the anticipated area and volume of earthworks overall and within ecologically sensitive areas.	Outlined in <b>Section 3.5</b> (overall Ara) and <b>Section 3.14 (Table 3.2)</b> and <b>Section 4</b> (for each segment). As outlined in <b>Section 5.2.1</b> , no works are proposed within 10 m of a natural inland wetland.	Conservative anticipated <sup>1</sup> earthworks areas are outlined in the <b>Tracker (Appendix D)</b> .

<sup>1</sup> Information provided in the Tracker should be interpreted as approximate estimates of the indicative amount or scale of works required for the construction of the Ara, noting that these numbers are based on conservative upper limits and are subject to change during detailed design.

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
	<p>Earthworks volumes addressed in Proposed Conditions (<b>Appendix T</b>).</p> <p><i>Note: A wider Sensitive Area Consent Corridor, outlined in Section 1.7.5, which includes ecologically sensitive areas is proposed to enable greater flexibility for final ara alignment during detailed design. The intention is that this would allow greater flexibility and reduce the need for earthworks in ecologically sensitive areas.</i></p>	<p><i>Note: The Tracker outlines the anticipated earthworks area within each km and if a PMA/TASCV is present within each km.</i></p> <p>The <b>Ecological Impact Assessment (EcIA) (Appendix H)</b> assesses the ecological effects of the Project based on these conservative estimates in the <b>Tracker</b>.</p>
(e) Details on the vegetation impact areas (m <sup>2</sup> ) across different ecosystem/habitat types and within sensitive ecological areas (i.e., in or within Significant Natural Areas or Significant Natural Heritage Areas) and details of 10 m setbacks from wetlands and streams, etc.	<p>Outlined in <b>Section 3.6</b> (overall Ara) and <b>Section 3.14 (Table 3.2)</b> and <b>Section 4</b> (for each segment).</p> <p>As outlined in <b>Section 5.2.1</b>, no works are proposed within 10 m of a natural inland wetland.</p> <p><i>Note: A wider Sensitive Area Consent Corridor, outlined in Section 1.7.5, which includes ecologically sensitive areas is proposed to enable greater flexibility for final ara alignment during detailed design. The intention is that this would allow greater flexibility and reduce the need for vegetation removal in ecologically sensitive areas.</i></p>	<p>Anticipated vegetation clearance within and outside of PMA/TASC/SVMA areas are outlined in the <b>Tracker</b>.</p> <p><i>Note: The Km Tracker Guidance Document (Appendix D) provides an explanatory note on the methodology used to determine anticipated vegetation clearance.</i></p> <p>The <b>EcIA</b> assesses the ecological effects of the Project based on these conservative estimates in the <b>Tracker</b>.</p>
(f) A confirmed track alignment. If a degree of flexibility is required, the Applicant should be clear where alternative track alignments may be, to ensure effects on all potentially impacted areas are assessed.	<p>Proposed Ara concept alignment and consent corridor approach (including 'Standard Consent Corridor' and 'Sensitive Area Consent Corridor') is outlined in <b>Section 1.7.5</b>.</p>	<p>Proposed Ara concept alignment provided on <b>PDF Ara Alignment Maps (Appendix B)</b> and <b>GIS map (Appendix C)</b>.</p>
<p><b>Proposed Infrastructure</b></p> <p>(a) To understand the effects of permanent infrastructure, the following information is required:</p>	<p>Location and design of waterbody crossings outlined in <b>Section 4</b> for each segment.</p> <p>Fish passage addressed in <b>Section 7.3.3</b>. Bridges will be single span and will not impact on fish passage. Culverts will be avoided where possible. If required, culverts will</p>	<p>Location and design of waterbody crossings outlined in the <b>Tracker, Waterbody Crossing spreadsheet (Appendix E)</b> and <b>CMP</b>.</p> <p>Fish passage addressed in <b>EcIA</b>.</p>

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
The location and design of stream crossings, detail on how fish passage has been considered in the design, whether additional consents are required, and what monitoring and maintenance will be undertaken post-construction.	<p>be installed to meet the permitted activity standards of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 and Tairāwhiti Resource Management Plan to ensure that fish passage is maintained.</p> <p>As outlined in <b>Section 5.2.1</b>, no resource consents are sought under the NES F.</p> <p>Monitoring and maintenance post-construction addressed in <b>Section 3</b> and in <b>Proposed Conditions</b>, including in the requirements for the Construction Ecological Management Plans.</p>	Monitoring and maintenance post construction addressed in OMMP ( <b>Appendix G</b> ).
(b) Detail regarding the locations, sizing, and extent of other infrastructure, such as huts, toilets, and carparks.	<p>Huts and shelters have been removed from the proposal. No new carparks are proposed.</p> <p>Details of toilets is provided in <b>Section 3.4</b> and <b>4</b> (for each segment).</p>	<p>Location of new toilets, existing public toilets and existing carparks are identified in the <b>Tracker</b>.</p> <p>Design detail and example imagery for the toilets is provided in the <b>CMP</b>.</p>
<p><b>Operational Details</b></p> <p>To understand the long-term and cumulative effects of the Proposal, more information is required with regard to the operational phase of the Project, specifically:</p> <p>(a) The number of visitors expected to use the track, whether this will be controlled or regulated, and who will be responsible for ensuring user behaviour minimises effects on the environment.</p>	<p>The Trust is responsible for the governance and administration of the Ara as outlined in <b>Section 3.13</b> and <b>7.12</b>.</p> <p>The proposed Passport System will regulate visitor numbers and provide information to ensure user behaviour minimises effects on the environment.</p>	Addressed in <b>OMMP</b> .



Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
(b) Confirmation as to whether track users will be able to bring pet dogs on the trail.	Dog access management discussed in <b>Section 7.3</b> .	Dog access management measures are discussed in the <b>EclA</b> . Dog access will be managed by the <b>OMMP</b> , including through the provision of the Passport System.
(c) The Applicant is proposing to manage effects that will result from ongoing track use by way of a passport system. More information is required regarding this system, specifically what it will require of track users and how it will be enforced/policed, especially as the track will be accessible to the public and day walkers will be encouraged.	Information on the Passport System is outlined in <b>Section 3.13</b> and <b>7.12</b> .	Information on the Passport System is provided in the <b>OMMP</b> .
<b>Ecological Values</b> The Applicant has undertaken an extremely high-level assessment of ecological values. The assessment was informed by planning overlays and focusses on ecologically significant areas identified in planning documents. It therefore fails to assess the ecological values across the 500 km extent of the proposed track and over the multiple ecological districts and varied habitats the track will bisect.	Discussed in <b>Section 1.3, 2.4, 4</b> and <b>7.3</b> . A two day site visit was attended by an ecologist to inform the assessment of ecological values. Requirements for pre-construction confirmatory ecological surveys and on site investigation addressed in <b>Proposed Conditions</b> .	A detailed desktop assessment of the ecological values along the proposed Ara concept alignment was undertaken for the <b>EclA</b> . Section 3 of the <b>draft Ecological Survey and Management Plan Protocol (ESMPP) (Appendix H)</b> outlines requirements for pre-construction confirmatory ecological surveys at the detailed design stage and identified areas that require on site investigation and survey. A local ecologist (Graeme Atkins) was engaged for these assessments.

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<p>To assess ecological values over the Project extent, this would require at a minimum:</p> <p>(a) A detailed desktop assessment of the ecosystems and ecological values along the proposed track alignment. As part of the desktop exercise, areas that require on site investigation should be identified.</p>		
<p>(b) "Ground truthing" by way of site assessments, which may require detailed data collection.</p>	<p>The ecological assessment has primarily been undertaken as a desktop study which was supplemented by a two day site familiarisation visit.</p> <p>During detailed design, pre-construction confirmatory ecological surveys and on site investigations will be undertaken as outlined above and are addressed in <b>Proposed Conditions</b>.</p>	
<p><b>Staging of Project and ecological effects assessment</b></p> <p>Staging of the Project and carrying out detailed site investigations and ecological impact assessments prior to consenting each stage would allow for ecological effects to be assessed in detail and managed effectively.</p> <p>Further to this, an assessment of ecological values should consider:</p> <p>(a) The location, extent, and vulnerability of ecologically sensitive and significant habitats, such as natural inland wetlands and dune systems; and</p>	<p>Discussed in <b>Section 2, 4 and 7.3</b> and addressed in <b>Proposed Conditions</b>.</p>	<p>Ecological values and appropriate management and effects mitigation measures are outlined in the <b>EclA</b>, including PMA, TASCv, MASCV, Ngā Whenua Rāhui Kawenata covenanted areas and QEII National Trust covenanted areas.</p> <p>TRMP overlays and non-scheduled mapped wetlands can be identified on the <b>PDF Ara Alignment Maps</b> and <b>GIS map</b>.</p>

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
(b) The location, density, and vulnerability of populations of threatened species. Of particular relevance to this Proposal are the risks posed to Hochstetter's frog ( <i>Leiopelma hochstetteri</i> ) and threatened avifauna populations.	Discussed in <b>Section 2, 4</b> and <b>7.3</b> and addressed in <b>Proposed Conditions</b> .	Ecological values and appropriate management and effects mitigation measures are outlined in the <b>EclA</b> , including for Hochstetter's frog ( <i>Leiopelma hochstetteri</i> ) in <b>Section 3.3.3, 4.3.4</b> and <b>5.5.1</b> and threatened avifauna populations in <b>Section 3.2.2</b> .
<p><b>Effects Management</b></p> <p>The Applicant has proposed to manage effects by way of an Ecological Survey and Management Plan Protocol (MP). While management plans can be useful tools for managing adverse effects, the MP provided with the Application is, in essence, a framework for conducting an ecological impact assessment. If implemented, this MP will result in a de facto consenting process implemented through compliance checks and controls.</p> <p>(a) As a first step, ecological values and potential effects need to be identified. These can then be considered and addressed in appropriate detail by an effects management plan.</p>	Ecological values identified in in <b>Sections 2 and 4</b> , and potential ecological effects assessed in and <b>7.3</b> .	Ecological values and appropriate management and effects mitigation measures are outlined in the <b>EclA</b> .

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<p>Moreover, due to the sensitivity and vulnerability of populations of threatened species, we are of the opinion that:</p> <p>(b) more detail needs to be provided with regard to the management of potential adverse effects on Hochstetter's frogs and threatened native bird populations, especially during nesting season. This may require engaging fauna specialists to develop management strategies.</p>	<p>Discussed in <b>Section 2, 4</b> and <b>7.3</b> and addressed in <b>Proposed Conditions</b>.</p>	<p>Management of Hochstetter's frogs is addressed in <b>Section 3.3.3, 4.3.4</b> and <b>5.5.1</b> of the <b>EclA</b> and <b>Section 8</b> of the <b>ESMPP</b>.</p> <p>Native bird populations are addressed in <b>Section 3.2.2</b> of the <b>EclA</b> and an avifauna management plan is outlined in <b>Section 7</b> of the <b>ESMPP</b> which includes recommendations for bird nesting surveys and other best practice methodologies to avoid nesting birds.</p>

## TE ARA TIPUNA – RESOURCE CONSENT APPLICATION – FURTHER INFORMATION RESPONSE (LANDSCAPE)

NOTE: It is acknowledged that the further information requested below seeks detailed design information related to the Project. As set out in Section 1.7.3 of the Assessment of Effects on the Environment (AEE), given the length of the Ara, detailed concept plans have not been prepared, as this is neither practical nor necessary to assess the effects of the project. Section 1.7 of the AEE broadly sets out the approach to the application including detailed design stage, consent corridor approach and proposed conditions and management plans. Notably, the Proposed Conditions (Appendix T of the AEE) include provisions for detailed design including specific parameters for compliance.

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<p><b>Concept Plans:</b> The applicant must submit sufficiently designed landscape plans to outline the proposal to a conceptual level to sufficiently enable both assessment and peer review.</p> <p>If the production of such plans is considered to be too expensive or time consuming for the full length of the trail, the applicant might consider staging the project and applying for the consent of individual sections over an extended time period?</p> <p>Applicant to submit concept plans for all or a single consented stage of the route meeting the below requirements</p>	Regarding further design detail, please see note above.	<p>The <b>LVA (Appendix I)</b>, contains illustrative sketches including at Anaura Bay, for paddock tracks and low-impact bush tracks (<b>Appendix E of the LVA</b>).</p> <p>The <b>draft Construction Management Plan (CMP) (Appendix F)</b>, contains concept design information including:</p> <ul style="list-style-type: none"> <li>• Appendix A: Typical Ara cross-sections (ara and structures)</li> <li>• Appendix B: Bridge crossing safety options</li> <li>• Appendix D: Typical toilet block</li> <li>• Appendix E: Typical steps</li> <li>• Appendix F: Example Swing Bridge Crossings</li> <li>• Appendix G: Example Timber Bridge Crossings</li> </ul> <p>Accordingly, it is considered that the concept design information provided on the technical reports is sufficient to enable an assessment and peer review.</p> <p>Ara alignment as indicated by the <b>PDF Ara Alignment Maps (Appendix B)</b>.</p> <p>Link to the <b>GIS map</b> is provided in <b>Appendix C</b>.</p>
<p><b>Concept plan requirements: Drafting</b></p> <p>i) A recognized scale and north point</p>		

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
ii) Accurate and tested locations of the proposed path alignment (within nom. 2 m of the centre line) iii) Proposed indicative envelope of Extent of Works – (Reduced down from the current 50 m allowance) iv) Plan annotation explaining localized challenges or features of design yet to be confirmed v) Plan annotation of existing elements and features vi) Alternative routes, or identification of lengths of the route where certainty of path alignment is as yet to be confirmed. Areas to be kept to a minimum		
<b>Concept plan requirements: Trail</b> vii) Extent of path types and general location of the proposed typical cross sections of the Construction Management Plan – whether lengths of the trail are intended as existing paths, way finder markers only, on road paths or new bush tracks	<p>As stated in <b>Section 1.73</b>, the 'Km by Km Tracker' (Tracker) provides an estimate of the extent and type of works that will be undertaken, among other key information, for each individual km of the Ara. The Tracker was prepared to support independent effects assessments based on a conservative assessment of the indicative nature and extent of the construction works and trail design anticipated within each km. The Tracker, along with a guidance document prepared to assist users, is attached as <b>Appendix D</b>.</p> <p>Based on the Tracker, <b>Table 3.2</b> of the AEE was prepared to provide a summary of proposed works, including the trail type, waterbody crossings, new structures, earthworks and</p>	<p>Addressed by the <b>Tracker (Appendix D)</b>.</p>

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
	land disturbance, and vegetation removal proposed within each segment of the Ara.	
viii) General proposed levels of paths to a conceptual level sufficient to demonstrate practicality of design response	Broadly, discussed in <b>Section 3</b> and <b>Section 4</b> with regard to a description of the route by segment.	Concept design information provided in Appendix A, B and D – G of the <b>CMP</b> , including examples of low bench track examples and typical steps.  The indicative location of each of these path types is provided in the <b>Tracker</b> .
ix) Indicate sections of trail length where the trail will need to be future proofed to accommodate Stage 2	N/A – Stage 2 does not form part of this application.	N/A – Stage 2 does not form part of this application.
<b>Concept plan requirements: Structures and Elements</b> x) General / indicative locations of minor structures e.g. lengths of steps including those broken by intermittent landings which are more than 8 m in length, significant lengths of fall protection barriers more than 8 m length, viewing platforms or small bridges less than 8 m length, path segregation markers for lengths greater than 8 m including lengths intermittently broken by gaps	Discussed in <b>Section 3</b> .	Concept design information for structures is provided in the <b>CMP</b> .  Location of structures are identified in the <b>Tracker</b> .
xi) Specific / Individual conceptual level elevations to recognized scale and indicative materials of any significant structures e.g. bridges of approximately 8 m or longer,	The waterbody crossings proposed within each segment of the Ara are summarised in <b>Table 3.2</b> of the AEE, and further detail on the specific locations and characteristics of each crossing is provided in <b>Section 4</b> .	Addressed by the <b>Tracker</b> and the <b>Waterbody Crossing spreadsheet (Appendix E)</b> .  Indicative concepts for crossing options are included within <b>Appendix F</b> of the <b>CMP</b> .

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
retaining walls 1.5 m or higher for lengths greater than 8 m		
xii) Toilet blocks. Typical footprints and elevations of toilet blocks to recognized scale outlining indicative materials and proposed connection details – i.e. septic tanks or connection to sewerage. Confirmation that locations are appropriate for septic treatment where in the coastal environment. Identification of size of toilet block typologies. e.g. 2no. cubicles, 6no. cubicles, 12no. cubicles as proposed.	Addressed in <b>Section 3.4</b> and <b>Section 4</b> of the AEE.	Concept design information for toilets is provided in Appendix F of the <b>CMP</b> . The location of new toilets is identified on the <b>GIS</b> and in the <b>Tracker</b> .
xiii) Huts and Shelters. Typical footprints and elevations of huts and shelters to recognized scale outlining indicative materials and approximate sizes	N/A – Huts and shelters have been removed from the proposal.	N/A – Huts and shelters have been removed from the proposal.
xiv) Location of any proposed carparks: their size, associated signage and markings and entry / exit points	N/A – No new carparks are proposed.	N/A – No new carparks are proposed.
<b>Concept plan requirements: Earthworks</b> xv) Areas of potential / likely extensive earthworks Planting	Refer to <b>Section 3.5</b> , <b>Table 3.2</b> and <b>Section 4</b> of the AEE for anticipated earthwork quantum.	Refer to the <b>Tracker</b> for a Km-by-Km breakdown of areas of potential/ likely extensive earthworks.
xvi) Location and / or potential location of notified trees, or		



Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
significant areas of vegetation to be removed.	Vegetation removal is outlined in <b>Section 3.6</b> and <b>Table 3.2</b> of the AEE and <b>Section 4</b> for each segment.	Refer to the <b>Tracker</b> for a Km-by-Km breakdown for extents of high ecological value (PMA/TASC/SVMA) and other areas.
xvii) High level calculation of area of canopy cover to be removed		
xviii) Extent and types of planting proposed, including indicative high-level quantities and sizes at installation whether for amelioration or mitigation.	Discussed in <b>Section 3.12</b> of the AEE. <b>Section 7.4</b> of the AEE and the <b>LVA (Appendix I)</b> details where planting mitigates effects and where it is resulting in enhancement/ positive effects. Regarding further design detail, please see note above.	Broadly, the locations of proposed planting and landscaping measures are detailed in the <b>ESMPP</b> and <b>LMPF</b> attached as part of <b>Appendix H</b> and <b>Appendix I</b> .
xix) Identification of areas of vegetation mitigation and areas of vegetation enhancement / restoration		
<b>Concept plan requirements: Signage and Wayfinding</b> xx) Indicative elevations of narrative or identity markers or other bespoke elements	Discussed in <b>Section 3.11</b> of the AEE (including <b>Table 3.2</b> ).	Concept design information provided in <b>CMP</b> . Indicative location of path types provided in the <b>Tracker</b> .
<b>A) Planting Proposals [request summarised below]</b> High level planting strategies including proposed strategy for stock browsing, fencing and approach to applying the NZTA Landscape Guidelines.	Planting approach overview provided in <b>Section 3.12</b> of the AEE. Discussed in <b>Section 7.3</b> ecological effects and <b>Section 7.4.2</b> overall effects and mitigation for landscape, visual and natural character effects. Regarding further design detail, please see note above.	The proposed planting and landscaping measures are detailed in the <b>ESMPP</b> and <b>LMPF</b> . Other maintenance measures are proposed in the <b>draft Operational and Maintenance Management Plan (OMMP) (Appendix G)</b> .
Extent, location and approximate quantity of planting.		

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
Identification and concepts for enhancement areas (relevant to NZCPS Policy 14).	Policy 14 is assessed in <b>Section 8.3.1 (Table 8.1)</b> of the AEE.	The <b>LVA</b> notes that the direction of the NZCPS policies is applicable to the assessment, and relevant provisions are identified in Appendix B of the <b>LVA</b> .
Rehabilitation and enhancement planting principles and details to be applied.	Overview provided in <b>Section 3.12</b> of the AEE.	The proposed planting and landscaping measures are detailed in the <b>ESMPP</b> and <b>LMPP</b> .
<b>B) National Coastal Policy Statement</b> Appendix B. Policy 14 of the New Zealand Coastal Policy Statement – “Restoration of Natural Character” has not been annotated as being considered in Appendix B. At places within the LVA it appears this policy has been considered at high level. Has Policy 14 been considered?	Assessed in <b>Section 8.3.1 (Table 8.1)</b> of the AEE.	The <b>LVA</b> notes that the direction of the NZCPS policies is applicable to the assessment, and relevant provisions are identified in Appendix B of the <b>LVA</b> .
<b>C) Site visit/ground testing by LVA author</b> Has the route been walked and ground tested?  What is the extent of Site Visit conducted by the LVA author?	The <b>LVA</b> analyses the existing environment of the Ara through the baseline evaluation appended to the report ( <b>LVA Appendix C</b> ). This evaluation is informed by desktop analysis, local knowledge and site visits to areas on the Ara in the vicinity of SH35 and to many of the coastal communities that the Ara passes through, including on a 2-day hikoi with the Project team in June 2025. It is not currently possible to safely traverse the whole Ara extent.	
<b>D) General Trail at Particular Points – Examples</b> At approximately the 135 km mark the track appears to be directed along areas of land suffering from	As outlined in <b>Section 1.7.4</b> and <b>7.5.3</b> , further adjustments will be made to the alignment during detailed design within the consent corridor to avoid geotechnical hazards and mitigate effects based on additional geotechnical input.	The <b>Geotechnical Assessment – Revised Track Layout Addendum Report (Appendix N)</b> notes that “New Trail alignment crosses some relatively low angle landslips (Located in East Coast Allochthon). Some track adjustments to avoid active landslips likely required.”

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<p>subsidence for approximately a kilometre.</p> <p>Is this route possible?</p>	Regarding further design detail, please see note above.	
What is the alternative route if this route is not possible?		
At around the 205 km mark where the East Cape Road is constrained by the coast and the coastal environment what is the proposed path treatment in this area? Will pedestrians walk on the road?	N/A	As identified in the <b>Tracker</b> , km 205 is 100% wayfinding and pedestrians will follow the road corridor.
From mark 222 – 238 km the path follows the Wahrekahika River. Are any sections of the path in the flood plan?	No – not identified as being mapped flood plains/ zones.	No – not identified as being mapped flood plains/ zones.
<p><b>E) Investigation of Makarori Beach Reserve identified by the LVA as requiring further investigation</b></p> <p>At the transition from the beach at approximately the 4 km mark the trail is proposed to enter the Makarori Beach Reserve. This area is referenced in section 10.10 by the LVA as needing further investigation.</p> <p>When this review examined this 150 m length it demonstrates the LVA's point, and the following questions and comments arose:</p>	Assessment summarised in <b>Section 7.4.3.1 of the AEE.</b>	The <b>LVA</b> addresses the existing landscape character and identified values of this area as part of 'Section 1: Makorori Headland to Tolaga Bay, Uawa'.

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<p>The landscape character of the reserve is not covered in LVA Appendix C.</p> <p>What are the existing landscape character and identified values of this area?</p>		
<p>What is the nature of the existing vegetation in this area, is there thick undergrowth?</p>	Please see note above.	<p>As shown in the <b>Tracker</b>, earthworks and high ecological value (PMA/TASC/SVMA) vegetation removal are proposed at km 4 (up to approximately 1.5 m width). However, after km 4 to km 9, no earthworks or vegetation removal is expected.</p>
<p>Does the applicant propose any vegetation removal?</p>		
<p>On plan J2004-200-05 of the CMP the trail can be seen for approximately 30 m up the embankment but is not shown thereafter. The path appears to go under canopy cover adjacent to a stream from the beach up a coastal escarpment.</p> <p>Will the path alignment be affected by flooding from the unnamed stream?</p>	Not identified as being within the Flood Hazard Overlay.	<p>Not identified as being within the Flood Hazard Overlay.</p> <p>Refer to the <b>GIS map</b>.</p>
<p>Using the contours supplied on the GIS plan it appears the path alignment will rise 80 m over a length of 120 m. A direct route as indicated would require a rise of 1:1.5. Given the extent of tree</p>	N/A – Amended alignment.	Refer to the GIS map.

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
canopy a direct route, as shown, therefore seems unlikely. What is the actual proposed route? Has the route been tested on site?		
Given the steep topography what level of structure will be required in this area?	Refer to <b>Table 3.2 of the AEE</b> for a high-level overview of the proposed works by segment. Regarding further design detail, please see note above.	As shown in the <b>Tracker</b> , steps are provided at km 4. Generally, steps are provided for gradients over 25% and non-remote locations. A site-specific assessment at detailed design is noted as being required.
Is the applicant sure that a path or structure can be placed and constructed on this steep escarpment?		
Is there an alternative route identified if this path cannot be realized?		

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<p><b>F) Significant Proposed Bridge - Pakarae River</b></p> <p>Concept, drawings or elevation details of the proposed bridge over the Pakarae River (at the 23 km mark also referenced in section 10.10).</p> <p><i>"A large bridge is proposed to span the approximate 120m wide valley. The cliffs to the south are indicated as being approximately 20m higher than water level (approximately 5 storeys up). This proposed structure will need to be a substantial structure yet no substantive concept, drawing or elevation is provided of the proposed bridge."</i></p> <p>The LMP covers all bridges with four bullet points, while the CMP provides no detail for bridges of this scale. The following questions therefore arise relevant to the landscape effect.</p> <p>What type of bridge is proposed - suspension?</p> <p>What materials will the bridge be constructed of?</p> <p>What will the visual catchment of the bridge be?</p>	<p>N/A – An existing local road bridge will be used to cross the Pakarae River (using Pakarae Road).</p>	<p>N/A – An existing local road bridge will be used to cross the Pakarae River (using Pakarae Road) at km 33a (Waterbody Crossing No. 14 in <b>Appendix E</b>).</p>

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
In establishing the bridge heads what earthworks will be generated?		
What are the temporary effects of construction?		
Will any foundations be constructed within the riverbed?		
How stable are the surrounding cliffs?		
What will the gradient of the bridge deck be?		
Given the fall height, what height will bridge barriers be?		
On the approaches to the bridge what fall barriers are proposed?		
If the bridge can't be built or is cost prohibitive what is the alternative route, and what length of track would be anticipated to be realigned?		
What is the underlying ground condition here? Has any geotechnical information been gathered?		
It appears alternative routes would require kilometres or re-routing, and the consequences of such rerouting are not addressed.		

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
In the same way, consideration should be given to multi-modal travel anticipated of Stage 2. Sufficient track width, grade allowance and separation between uses should be allowed for to prevent unnecessary later route realignment.		
<p><b>G) Proposed Bridges</b></p> <p>At the 108 km mark, near Waikawa Road and Waipiro Bay a new smaller but still significant bridge is proposed as are other bridges at the 127 km mark near Whareponga Road, the 135 km mark near Tuparoa Road and the 234 km mark near the Wharekahika River.</p> <p>These bridges will be crossing approximately 40 m wide riverbeds, surrounded by what appears to be native bush. Again, no substantive concept, drawing or elevations have been provided of these proposed bridges as the LVA acknowledges.</p> <p><i>9.1 e) "Overall, the findings in this LVA are to carry out further investigation to confirm the number and type of bridges required for the project in each catchment and to</i></p>	<p>Bridge locations, approximate specifications and relevant waterways are detailed in <b>Section 4</b> of the AEE for each segment.</p> <p>Regarding further design detail, please see note above.</p>	<p>Bridge locations, approximate specifications and relevant waterways are detailed in the <b>LVA</b> for each section.</p> <p>Addressed by the Tracker and the <b>Waterbody Crossing spreadsheet</b>.</p> <p>Indicative concepts for crossing options are included within the <b>CMP</b>.</p>



Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<p><i>consider the need to avoid additional adverse natural character effects."</i></p> <p>The following questions therefore arise relevant to the appropriateness of the trail alignment and associated landscape effects:</p> <p>Names of the rivers and (named) streams are not always present on GIS plans. Please:</p>		
Provide the known names of waterways		
What is the proposed length of the bridges?		
How many piers will the bridges need?		
Where are the piers to be positioned?		
What is the proposed level of the bridge decks and why?		
Are there any navigation rights to consider and will these effect the level of the bridge decks? (Conceptual Investigation Only)	Addressed in <b>Section 7.11</b> of the AEE.	N/A
In establishing the bridge heads will any vegetation need to be removed?	Broadly discussed in <b>Section 7.4</b> of the AEE. Regarding further design detail, please see note above.	Discussed in the <b>LVA</b> for each section.

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
Has any flood modelling been undertaken?	Addressed in <b>Section 7.5.2</b> of the AEE.	The <b>Coastal Hazard Report (Appendix L)</b> provides an assessment of the potential effects of the proposed Ara on coastal hazards.  Measures are proposed in the <b>CMP</b> to manage stormwater runoff and flood events.
What materials will the bridge be made out of?	Refer to <b>Section 3.3</b> of the AEE. Regarding further design detail, please see note above.	Addressed by the <b>Waterbody Crossing spreadsheet</b> . Indicative concepts for crossing options are included within the <b>CMP</b> .
<b>H) Clip-on Bridges</b> In several areas proposals are included to attach additional paths to existing bridges. The following questions therefore arise relevant to the appropriateness of this proposal and the consequences to landscape effect: Has the asset owner confirmed this approach is approved? Has the strength and age of the existing bridges been checked to ascertain whether this is possible from an engineering point of view? What are the consequences to landscape effect and amenity if this approach fails? What would the effect to landscape and natural character be if new foot bridges were needed instead?	N/A – No longer proposed.	N/A – No longer proposed.

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
<p>The clip on bridges shown in the CMP show clip on bridges against rail bridges. These are used in a controlled work environment where standards applied are different to the public realm.</p> <p>What will the proposed clip-on foot bridges look like and what are they made of?</p>		
<p><b>I) Carparks</b></p> <p>Locations of carparks are not annotated on plans. No conceptual details of carparks are included such as size, entrances or pedestrian routes, wayfinding or statutory signage. No details of landscape mitigation of carparks has been supplied.</p> <p>What is the concept design of the carparks, where are they located and how have these been assessed?</p>	N/A – No longer proposed.	N/A – No longer proposed.
<p><b>J) Coastal impacts</b></p> <p>For lengths where the trail is proposed along beaches or coastal roads for example at the 22 km mark or at Tokomaru Bay as mentioned in section 11.2 of the LVA the following questions arise:</p>	<p>Broadly discussed in <b>Section 7.5.1</b> of the AEE.</p> <p>Regarding further design detail, please see note above.</p>	<p>The <b>Coastal Hazard Report</b> provides an assessment of the potential effects of the proposed Ara on coastal hazards.</p>

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
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Has the high tide mark been mapped and will the path remain open at high tides, including king tides?		
Has sea level rise been mapped and considered?		
If the path can't go along the beach or is temporarily closed is there an alternative route?	Refer to <b>Section 7.12.1 of the AEE</b> , specifically the passport system is expected to include maps showing potential hazards (this could include constraints related to tides).  No alternative routes are proposed.	N/A
Would an alternative route need to go through foredunes, coastal escarpments or sensitive landscapes?		
<b>K) Safety in Design</b> Has the Applicant conducted a conceptual level Safety in Design assessment of the trail?	A specific Safety in Design assessment is not provided, but as noted in <b>Section 1.3 of the AEE</b> , changes to the alignment at various locations were made primarily for safety reasons based on expert advice and NZTA submissions.  As stated in <b>Section 1.7.5</b> , the Ara itself (including signage) will be located within the consent corridor, with the exact location being determined during the detailed design stage which will include consideration of safety requirements – provided for in the <b>Proposed Conditions (Appendix T)</b> .	A specific Safety in Design is not provided, but the development of a safe trail design has informed the development of the suite of technical reports.
What effects to the landscape and amenity, if any, are caused by the inclusion of health and safety initiatives?	N/A	The <b>LVA</b> assesses the scale of effect based on the conservative approach taken by the <b>Tracker</b> . The <b>Tracker</b> and <b>Table 3.2 of the AEE</b> should be interpreted as approximate estimates of the indicative amount or scale of works required for the construction of the Ara, noting that these numbers are based on conservative upper limits and are subject to change during detailed design.

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		Specifically, within the consent corridor it may be possible to further limit the scale of works required.
Has a Safety in Design review identified the need for additional vertical elements such as fall from height barriers, telecommunications towers or path separators?	A specific Safety in Design is not provided, but safety has informed the design. Regarding structures, refer to <b>Section 3.3 of the AEE</b> . Regarding works in the road corridor, refer to <b>Section 3.8 of the AEE</b> . Regarding further design detail, please see note above.	A specific Safety in Design is not provided, but the development of a safe trail design has informed the development of the suite of technical reports.
Does the applicant consider that clearings for Helicopter landings will need to be created for emergency lift out?	No, but provision of other emergency procedures is discussed in <b>Section 7.12.1 of the AEE</b> and an Emergency Response Plan is required by the <b>Proposed Conditions</b> .	No, but other emergency procedures are provided for in the <b>OMMP</b> .
Has the applicant conducted consultation with emergency services and helicopter rescue providers?		
Does the applicant envisage the need to increase cellular coverage?	Increasing cell phone coverage does not form part of this application.	N/A
Does the applicant anticipate the introduction of additional telecommunications towers?		
Has the applicant liaised with telecommunications services?		
a) Has CPTED (Crime Prevention Through Environmental Design) been considered to the extent practicable?	Regarding further design detail, please see note above.	N/A

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
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Comment: It is acknowledged that trails through native bush and back country are intrinsically isolated.		
<b>L) Standards and Guidelines</b> <b>Comment:</b> Application of recognized standards would likely assist the Applicant in negotiations with stakeholders and make the design process more efficient.	Regarding further design detail, please see note above.	N/A
<b>i) New Zealand Standard for Track and Outdoor Visitor Structures</b> Can the applicant confirm that the trail will be built and designed to the New Zealand Standard: SNZ HB 8630:2013 Track and Outdoor Visitor Structures?	Regarding further design detail, please see note above.	N/A
a) If departing from the standard can the applicant provide reason as to why?  As part of the New Zealand standard it is recommended that the user group of the track be identified.		
<b>ii) NZTA / Waka Kotahi Guidelines</b> It is noted that the NZTA Landscape Guidelines are referenced and referred to within the LMP. This is agreed as an appropriate approach. 1. Where the trail is designed on or alongside Waka Kotahi assets can	Regarding further design detail, please see note above.	Acknowledged in the <b>LVA</b> , stating that on average, 75% of the total km along the Ara will require no works, other than to establish appropriate wayfinding (e.g., marker posts) and road safety signage (as per GDC and NZTA standards).  The <b>draft Landscape Management Plan Framework (LMPF)</b> states that standard P39 NZ Transport Agency

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the applicant confirm that the trail conforms with the NZTA Landscape Guidelines?		(NZTA) specification for landscape should be used as a reference <sup>1</sup> and base for the planting specification.
If departing from the guideline can the applicant provide locations of where and reason as to why?		
As per the NZTA Landscape Guidelines has the Applicant undertaken a Landscape Design Framework for areas of the trail designed on or alongside Waka Kotahi assets? If so please provide framework.		
Has the Applicant considered the NZTA Pedestrian Planning and Design Guideline?	N/A - The NZTA Pedestrian planning and design guide has been superseded by the draft Pedestrian Network Guidance (PNG).	N/A
If departing from the guideline can the applicant provide locations of where and reason as to why?	Regarding further design detail, please see note above.	
<b>iii) Bridging the Gap, NZTA Urban Design Guidelines,</b> Part 2 – Supporting Walking and Cycling	N/A - The NZTA Pedestrian planning and design guide has been superseded by the draft Pedestrian Network Guidance (PNG). Regarding further design detail, please see note above.	As addressed in <b>Transport Safety Assessment and Management Plan (Appendix K)</b> , standard designs are proposed for ara adjacent to SH35 (to be approved by

<sup>1</sup> Adapted to a natural regeneration approach, the specification structure (contents page headings) and clause requirements should be consistent with the required performance standards, quality, and workmanship of the Waka Kotahi, NZ Transport Agency (Waka Kotahi) P39 Standard Specification for Highway Landscape Treatments. This will include General Scope and Performance Measures, Quality Control, Site Preparation, Plant and Animal Pest Control, Plant Propagation, Topsoil Supply, Planting, Grassing, Hydroseeding Grassed and Specialists Surfaces, Defects and Liability Maintenance and (post 5 years/performance measures met) Ongoing Maintenance.

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
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Has the Applicant considered the NZTA Pedestrian Planning and Design Guideline?		NZTA). No use of live traffic lanes. Any departures from NZTA standards will be clarified at detailed design stage.
If departing from the guideline can the applicant provide locations of where and reason as to why?		
<b>Landscape and visual effects assessment clarifications</b>		
<b>A) Degree of Effect</b> The LVA does not provide findings on the degree of effects. This is a notable omission as findings on effects are a key purpose of an expert assessment. This shortfall is inconsistent with the concepts and principals of 'Te Tangi a te Manu', Tuia Pito Ora/New Zealand Landscape Assessment Guidelines 2022 (TTtM) (Clause 6.39, p.151 TTtM). The 7-point degree of effect scale recommended for use is described within TTtM as a: <i>"universal scale"</i> (Clause 6.21, p140 TTtM).  As the LVA does not provide findings on effect it is not demonstrated how the AEE has concluded that landscape effects are less than minor.	Addressed in <b>Section 7.4 of the AEE.</b>	Addressed in the <b>LVA.</b>



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Please provide a degree of effect for the project against the TTtM 7- point scale.		
<b>B) Assessment Against Landscape Relevant Policy</b> The LVA does not sufficiently assess the existing landscape values of distinct landscapes relevant to the project, as further investigation is noted as still being required in a number of settings. The assessment should consider the application against relevant policy matters. In this way, it is not demonstrated that Place specific (landscape values) consideration informed the design strategy and mitigation measures. Please provide assessment of the project against place specific landscape relevant policies and objectives.	Addressed in <b>Section 8 of the AEE</b> .	Addressed in the <b>LVA</b> .
<b>C) Ambiguity of Proposed Project Scope</b> The LVA and other documents refer to shared paths, vehicle paths and cycling tracks. Whilst it is understood that these are now to be included in Stage 2 and are not part of the consent, reference to these elements causes ambiguity. It is not	N/A – Stage 2 does not form part of this application.	NN/A – Stage 2 does not form part of this application.

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<p>always clear which elements are part of the current application and which are not. It is not clear which parts of Stage 2 will need to be constructed as part of Stage 1 to future proof Stage 1 for the later application and installation of Stage 2.</p> <p>It is not the role of the consenting authority to determine what is and isn't part of the proposal.</p> <p>To assist those reviewing and reading this assessment it is recommended that the LVA and associated landscape submissions are updated to reflect the Stage 1 and future proofing design elements only.</p>		
<p><b>D) Plan Reference Numbers</b></p> <p>For reader ease where place names are used in the report, please denote the place names with reference to the location of the place name on the relevant Concept Plan identified by the drawing's number.</p>	Completed – locations used in the AEE approximately correspond with the <b>Tracker</b> and <b>GIS map</b> .	
<p><b>E) Site Photographs</b></p> <p>The addition of site photographs for the multiple site references along the trail's length would better illustrate the existing landscape and</p>	N/A	Refer to <b>LVA</b> and <b>GIS map</b> .

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
the effects of the proposal. It would assist with reader interpretation and enable assessment of the report's position.		
<b>F) Visual Effects and Elevations</b> Once conceptual elevations are developed it is requested that visual effects sections are updated.	Regarding further design detail, please see note above.	The <b>LVA</b> considers that there is sufficient information to assess visual effects. Refer to <b>LVA</b> .
<b>GIS visibility of the application</b> Following the digital plans through the portal is a cumbersome process. a) For reader and reviewer ease it is requested that .pdf plans be submitted. Refer Additional Information request for Concept Plans. Difficulties of viewing the digital portal include: <ul style="list-style-type: none"> <li>Place names not consistently loading depending on scale and zoom</li> <li>Elements and sites referred to within the LVA not being labelled on the digital portal</li> <li>Contour labels being at significant distances leading to confusion</li> </ul> ONF and ONL location areas not indicated on GIS portal plans.	Ara alignment as indicated by the <b>PDF maps, Appendix B</b> of the AEE.	N/A

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
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<p>The principles of the LMP are generally agreed with. However, in places the LMP uses loose terminology that can be open to interpretation. General guidance notes, and the inclusion of a few bullet points for substantial structures are considered insufficient to ensure the intended outcome.</p> <p>An example of wording that may result in ambiguous process or outcome is quoted below:</p> <p><i>"As a general guidance note, the earthworks design is to include input from the Project Landscape Architect and Ecologist and consider: the long and cross section; tie into the natural contours and final formation to encourage natural regeneration and enable mitigation planting (on fill batters)"</i></p> <p>The above statement does not require that landscape architectural input is followed.</p> <p>It is recommended that language of the LMP is reinforced to remove ambiguity and provide surety. General guidance notes should be replaced with clear direction and</p>	Completed.	Completed – refer to <b>LVA</b> .

Further information requested	Te Ara Tipuna's response and cross references to relevant sections of the AEE and accompanying reports	
	Response and AEE updates (with section references)	Technical report and application material updates (with section references)
specification. The owners of actions should be clearly identified.		
No detail is provided with regards to the visitor passport to ensure outcomes anticipated of it's use. It is anticipated that expectations of this may also be difficult to monitor or enforce. It is recommended "Should" and "Will" be replaced with the obligatory "must".	Addressed in <b>Section 7.12 of the AEE</b> . It is noted that physical restriction and/or real-time monitoring are not practicable given the scale of the Ara. However, active monitoring of user effects is provided for as part of the proposed site inspections. This is considered to be consistent with other ara of this nature.	Refer to <b>OMMP</b> .
It is noted that the LMP Contents Page refers to page numbers, however the document does not include page numbers. For ease of reference, could page numbers please be added to the LMP.	N/A	Amended – refer to <b>LVA</b> .