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**Sent:** Tuesday, 29 April 2025 3:58 pm  
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Kia ora,

Please see attached our Forest & Bird submission on the Annual Plan 2025-2026.

Thank you,

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29 April 2025 **Forest & Bird submission on the Waitomo Annual Plan 2025-2026 Consultation**

## 1. Introduction

- a. The Royal Forest & Bird Protection Society of New Zealand Inc. has been Aotearoa New Zealand's independent voice for nature since 1923 with many members and supporters nationwide. Forest & Bird's constitutional purpose is: *To take all reasonable steps within the power of the Society for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.*
- b. Forest & Bird is actively involved in regional and district planning processes relating to freshwater, coastal environments and biodiversity across Aotearoa New Zealand.
- c. Forest & Bird's Waikato branch is actively involved in regeneration projects and monitoring local and regional environmental issues.
- d. New Zealand has the world's highest proportion of species "At risk". In the last 1,000 years, 40 indigenous land and marine species have become extinct that we are aware of.
- e. With the current and growing impacts that climate change is having on our indigenous biodiversity, it is imperative that we ensure any impacts from developments and industry operations are avoided or mitigated as much as possible.
- f. Our submission on the Waitomo Annual Plan consultation is focused on Topic 2 – Future of the Mokau Sea Wall.

## 2. Mokau Sea Wall Proposals

- a. Forest and Bird has concerns about the proposed options for the Future of the Mokau Sea Wall.

## 3. Proposed Sea Wall Renewal Considerations

- a. To ensure that the future of Mokau, its community and coastal ecosystems are provided for and sustainably cared for, Forest & Bird advocates for the **Waitomo District Council to immediately plan for managed retreat**, if it has not done so already.

- b. While the renewed sea wall might delay the impacts of sea level rise and coastal erosion, the time in which more severe impacts are likely to occur which could either damage or compromise the new sea wall, is unknown and could be almost immediate. This could **potentially cost more than the figures proposed in the consultation document** if infrastructure is compromised sooner than expected, incurring costs for material removal, and repairment of public or private property damage. This would need to be a financial and long-term planning consideration.
- c. **Chapter 5 of the New Zealand National Adaption Plan provides Adaptation options including managed retreat.** This document is useful in guiding the building of a climate resilient Aotearoa New Zealand. Forest & Bird recommends referring to this document when building proposals for the community to assist in understanding the importance of adaptation planning.
- d. Forest & Bird are concerned about the potential for seabirds like kororā establishing within a new sea wall, compromising their nesting behaviours and endangering their chicks if the wall is subject to tidal surges during breeding season due to sea level rise. This concern also applies to other coastal areas within the Waitomo District including Mokau rivermouth and Awakino rivermouth. This expected loss of coastal habitats is frequently referred to as “coastal squeeze” (Doody, 2004, FitzGerald et al., 2008, Hughes, 2004). As a native species that is categorized as “in decline”, this potential impact must also be a consideration for future planning. **Forest & Bird recommends working with Waikato Regional Council and Department of Conservation on this consideration to assist with ongoing planning and impacts of infrastructure and climate change on coastal habitats.**
- e. The National Adaption Plan stresses the need for nature-based solutions. **Forest & Bird recommends that the Council considers how the actions now (such as the use of a sea wall) will impact the ability to effectively implement nature-based solutions and protect coastal features and indigenous species,** aligning with the New Zealand Coastal Policy Statement (NZCPS) now and in the future.

#### 4. Conclusion

- a. Forest & Bird is concerned that the proposals for the Mokau Sea Wall are not sustainable, cost effective or consider nature-based solutions as recommended by the National Adaption Plan.
- b. Forest & Bird recommends the National Adaption Plan be utilized and referred to when planning for the future of the district’s communities and infrastructure, including considerations for “coastal squeeze” and the NZCPS.

Thank you for considering this submission.

Elvisa van der Leden

Regional Conservation Manager – Taranaki & Waikato

Forest & Bird

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