

Emma Joyce

From: automated-message@tauranga.govt.nz
Sent: Thursday, 17 October 2019 6:05 PM
To: .submissions; [REDACTED]
Cc: [REDACTED]
Subject: Have your say on the Draft Coastal Structures Policy

Categories: Coastal Structures

Thank you for your feedback on the Draft Coastal Structures Policy



A copy of your submission follows.

Your feedback: Proposed change: Allow, under conditions, landowners to build new hard protection structures on council-owned land to protect their private property (subject to obtaining consents and permission). I support this policy. I go further and ask council to consider making a standard discounted fee and fast track the building permit for a sea wall where the applicant uses a standard generic plan such as BOP Regional Council Plan No. M1032 with attached instructions, I can make copies of this available to T.C.C. if required. This is because with Global Warming the Tauranga Harbour Inundation Hazard will damage property and T.C.C. has this opportunity to encourage property owners to build sea walls rather than make it too hard. If a generic plan is supported then issuing a building permit should be a simple and low cost process for Council. I am making this submission because I found getting the consent for my sea was a really difficult, expensive and slow process. I see this as an opportunity for Council to assist landowners and if all properties had good sea walls it would be safer for all waterfront properties.

Do you wish to speak at a committee hearing in support of your submission: Yes

Name: Barry Benton

Suburb: [REDACTED]

Email: [REDACTED]

If yes, please provide your phone number: [REDACTED]

Emma Joyce

From: automated-message@tauranga.govt.nz
Sent: Thursday, 31 October 2019 10:54 AM
To: .submissions; [REDACTED]
Cc: [REDACTED]
Subject: Have your say on the draft Coastal Structures Policy quick survey

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Coastal Structures

Thank you for completing the draft Coastal Structures Policy quick survey



A copy of your feedback follows.

When we decide whether to remove, install, maintain or renew a coastal structure, do you agree we should prioritise the structures that protect most essential public assets (like water and wastewater pipes, and essential roads)? Yes, I agree

Do you agree with allowing private landowners to take over the ownership and maintenance of a hard protection structure, or build a hard protection structure on Council land, to protect their property? Yes, I agree

Any comments: We agree that Council needs to focus on essential public assets and infrastructure to support our growing city. Supporting land owners to take responsibility to protect their properties from the risk of erosion is sensible and pragmatic. We agree that consents and permission need to be in place to ensure that structures are designed and built to suitable standards. However T.C.C. needs to ensure that the overly complicated, bureaucratic and expensive processes applied to building permits are not replicated. A simple, transparent process that does not harbour delays should be developed. Council has acquired land as part of the consenting process and created esplanade reserves. We consider Council should review this policy and possibly return land previously taken to property owners. They can then take responsibility for that lands care, planting and maintenance.

Name: Jan Jameson

Email: [REDACTED]

Suburb: [REDACTED]

Do you wish to speak at a committee hearing in support of your submission?: Yes

Phone: [REDACTED]

Emma Joyce

From: automated-message@tauranga.govt.nz
Sent: Saturday, 2 November 2019 8:56 AM
To: .submissions; [REDACTED]
Cc: [REDACTED]
Subject: Have your say on the draft Coastal Structures Policy quick survey

Categories: Coastal Structures

Thank you for completing the draft Coastal Structures Policy quick survey



A copy of your feedback follows.

When we decide whether to remove, install, maintain or renew a coastal structure, do you agree we should prioritise the structures that protect most essential public assets (like water and wastewater pipes, and essential roads)?: Yes, I agree

Do you agree with allowing private landowners to take over the ownership and maintenance of a hard protection structure, or build a hard protection structure on Council land, to protect their property?: Yes, I agree

Any comments:

Name: Ray Lowe

Email: [REDACTED]

Suburb: [REDACTED]

Do you wish to speak at a committee hearing in support of your submission?: Yes

Phone: [REDACTED]

Emma Joyce

From: automated-message@tauranga.govt.nz
Sent: Wednesday, 6 November 2019 7:29 AM
To: .submissions; [REDACTED]
Cc: [REDACTED]
Subject: Have your say on the draft Coastal Structures Policy quick survey

Categories: Coastal Structures

Thank you for completing the draft Coastal Structures Policy quick survey



A copy of your feedback follows.

When we decide whether to remove, install, maintain or renew a coastal structure, do you agree we should prioritise the structures that protect most essential public assets (like water and wastewater pipes, and essential roads)?: No, I disagree

Do you agree with allowing private landowners to take over the ownership and maintenance of a hard protection structure, or build a hard protection structure on Council land, to protect their property?: Yes, I agree

Any comments: Our Land is means more to us than any pipe system fortunately pipes can be moved where as we because of so many rules and red tape are unable to reclaim the land already lost

Name: Eruera tuhakaraina

Email: [REDACTED]
[REDACTED]

Do you wish to speak at a committee hearing in support of your submission?: Yes

Phone: [REDACTED]

Emma Joyce

From: automated-message@tauranga.govt.nz
Sent: Thursday, 17 October 2019 3:33 PM
To: .submissions; [REDACTED]
Subject: Have your say on the draft Coastal Structures Policy quick survey
Categories: Coastal Structures

Thank you for completing the draft Coastal Structures Policy quick survey



A copy of your feedback follows.

When we decide whether to remove, install, maintain or renew a coastal structure, do you agree we should prioritise the structures that protect most essential public assets (like water and wastewater pipes, and essential roads)?: Yes, I agree

Do you agree with allowing private landowners to take over the ownership and maintenance of a hard protection structure, or build a hard protection structure on Council land, to protect their property?: No, I disagree

Any comments: Coastal protection structures need to belong to the public, and the land behind them should be for the public benefit. Giving homeowners defacto ownership of water access ways is NOT OK, and that's exactly what would happen (and what has happened in any case in areas like Forester Drive). Council needs to do more to protect its public land from encroachment, rather than taking the entirely hands-off approach that it currently takes.

Name: Chris Doms

Email: [REDACTED]

Suburb: [REDACTED]

Do you wish to speak at a committee hearing in support of your submission?: No

Phone:

Emma Joyce

From: automated-message@tauranga.govt.nz
 Sent: Monday, 11 November 2019 10:44 AM
 To: .submissions; [REDACTED]
 Subject: Have your say on the Draft Coastal Structures Policy

Follow Up Flag: Follow up
 Flag Status: Completed

Categories: Coastal Structures

Thank you for your feedback on the Draft Coastal Structures Policy



A copy of your submission follows.

Your feedback: To whom it may concern I have read the proposed changes and are unsure as to where the following items (that I want to bring to your attention) fit into the proposals : All these existing structures are located on / or about the Kulim Park foreshore and Kulim Road esplanade reserve area : 1. Tauranga Yacht & Power Boat Club Building. I believe the foundations of this building are in urgent need of repair. My recent inspection reveals that supporting timber braces are either in a state of rotting away or have in fact already rotted totally away.... whereby they are not being structurally effective at all. Plus the bolts connecting the bearers to the support posts are in an extreme state of rusting out. Both these items I believe put this building at risk to the health and safety of those using it / or who are walking in - around it / or under it. 2. Boat ramp adjoining the above building. Located on the Kulim foreshore. This has been in a state of being decommissioned for sometime for reasons unknown to myself. I believed any upgrading of this structure (reducing the angle of incline) was going to form part of the new proposed Kulim Park redevelopments however it does not seem to be incorporated in the scheme plans. This was a valuable community amenity which I believe should be re-instated for the public use. 3. Stormwater outlet pipes. Located on the Kulim esplanade reserve from Bureta Rd running westwards towards Kulim Park. These pipes serve (as of right) stormwater dispersal from approximately six properties fronting the esplanade.. My property at [REDACTED] is one of these. After the recent sand replenishment of the beach adjoining this reserve some of these stormwater pipes have had to be extended so as to become effective. However to do some of them have unfortunately have become exposed (very unsightly) on this very pristine replenished beach area. It was my understanding that these were going to be linked together (underground) and piped to a common outlet as part of the proposed Kulim Park redevelopment. At this stage it appears have not been considered. 4. Native Grass Plantings. This is also related to the above Kulim Reserve beach replenished area. It was my understanding that pockets of native grasses were to be planted intermittingly along this beach primarily to combat potential beach erosion. This has yet to be carried out. My suggestion that such plantings should also form part of the foreshore redevelopment of Kulim Park. I can forward photographic evidence of all the above concerns. Regards John Little [REDACTED]
 TAURANGA [REDACTED]

Do you wish to speak at a committee hearing in support of your submission: Yes

Name: John Little

Suburb: [REDACTED]

Email: [REDACTED]

If yes, please provide your phone number: [REDACTED]



12 November 2019

Tauranga City Council
Private Bag 12022
Tauranga 3143
By email:

To whom it may concern,

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA TO THE DRAFT COASTAL STRUCTURES POLICY 2019 FOR TAURANGA CITY COUNCIL.

1. Thank you for the opportunity to make a submission on the proposed Draft Coastal Structures Policy 2019 (the draft Policy).
2. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead historic heritage agency and advocacy.
3. The draft Coastal Structures Policy has been developed under the Local Government Act 2002. The purpose of the local government Act 2002 is to:
 - a. s10 Purpose of local government
 - (1) *The purpose of local government is-*
 - (a) *to enable democratic local decision-making and action by, and on behalf of, communities; and*
 - (b) *to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.*
4. The draft Policy applies primarily to the management of coastal structures on Council owned or administered land in the inner harbour and coast. In some instances it is also applicable to private land. The draft Policy proposes among other things to clarify the reasons for the location/installation/maintenance and removal of coastal structures.

Background

4. Current projections suggest that sea levels may rise around New Zealand by up to 1 metre within 100 years¹. A rise in 0.5 meters will occur, no matter the level of intervention at this stage². The loss of historical and cultural heritage values associated with coastal erosion from sea level rise will be magnitudes greater than any loss of heritage we have seen from other natural events and disasters, and will happen over a long period of time. It is possible that without adequate preparation we will not be able to proactively address the issue, and only react as catastrophes arise.
5. Peer reviewed research indicates that a 1m sea level rise will result in approximately 5300 of the archaeological sites around our coastline, or 7.7% of our total archaeological record³ being underwater. This number doesn't account for the sites impacted by future storm surges and flooding, which will result in significantly greater damage and loss, or Māori ancestral sites that are not evidenced by archaeological means.
6. Damage and loss of cultural and historic heritage has already begun, many archaeological sites and urupa have been reported as eroding in our national media. HNZPT staff have been involved in a number of these cases.

HNZPT Response to the draft Policy

7. The consideration of historic heritage and Tangata whenua values in the context of coastal structures has to be seen in the wider context of natural hazards, climate change and disasters. This will require an overall response that will be wider than just the draft Policy. There would be benefit in the introduction section of the draft Policy making reference to any associated processes within Tauranga City Council that may be relevant and that also have to be considered by those making decisions in relation to coastal structures under this policy.
8. Coastal structures are subject to a large number of legislative processes, including the requirement for archaeological authorities from HNZPT for any works to damage or modify. HNZPT notes on Pg. 1 the acknowledgment of the draft Policy not "*overriding district or regional plans produced under the Resource Management Act 1991*". There is also a note in relation to other legislative requirements to which private landowners may be subject on pg. 4 of the draft Policy. There would be benefit in the inclusion of other legislation that could be relevant for those considering works in the coastal area. This could be included on the last page below the 9.Schedules.

¹ Summarised in *Coastal Hazards and Climate Change: Guidance for Local Government* 2017, Ministry for the Environment, pages 93-99.

² A Framework for the National Climate Change Risk Assessment for Aotearoa New Zealand. 2019. Ministry for the Environment, page 19

³ McCoy, 2018. "The Race to Document Archaeological Sites Ahead of Rising Sea Levels: Recent Applications of Geospatial Technologies in the Archaeology of Polynesia" *Sustainability*: 10:185.

9. HNZPT **seeks** an amendment to the draft Policy with the following (addition underlined) as a new section 10 as follows:

"10. Other relevant legislation

10.1 Heritage New Zealand Pouhere Taonga 2014"

10. HNZPT understands that the consideration of historic heritage and tangata whenua sites of significance in the context of climate change and hazards is potentially complex as regard must be given to the sites that lie directly in the path of coastal erosion and hazards and similar types of sites that may be located within the areas where those structures, services, utilities, roads and buildings are forced to retreat to should this be required. Other concerns lie with the detail of the various approaches, for example hard and soft engineering. Certainly HNZPT is concerned that both hard, and soft engineering approaches such as dune planting have the potential to damage or destroy archaeology and other historic heritage.
11. HNZPT appreciates that the draft Policy makes the reference at 5.1.3, that *"Council will also consider the significance of the area to mana whenua in determining management options."*⁴ With regard to coastal areas of interest to Tangata Whenua HNZPT considers that there would be merit in Tangata Whenua being consulted as overall work programmes are being developed, rather than on an ad hoc basis as the need for works arise. Having a greater overview of the proposed coastal works will allow more informed decision making for Tangata Whenua, particularly if a site of significance has to be lost or choices may have to be made between sites.
12. HNZPT **seeks** (additions underlined) that the last sentence of 5.1.3 is amended as follows; *"Council will also consider the significance of the area to mana whenua and consult with mana whenua in determining management options."*
13. HNZPT notes that the criteria in Schedule one of the draft Policy has to be considered when determining management options for structures. The criteria does not specifically include reference to Tangata Whenua or historic heritage and HNZPT considers that these two important matters should be referenced within the criteria and become part of the decision making process. HNZPT would want to be certain that the criteria included in Schedule one would apply to any decision making process on public or private land under this Policy.
14. HNZPT **seeks** (additions underlined) that Schedule one is amended to include *"Effects on Tangata whenua sites and values"* and *"Effects on Historic Heritage sites and values"*
15. When reading through the draft Policy it is not clear if the criteria in Schedule one is applicable to all hard engineering, soft engineering and managed retreat solutions and to works on public and private land. As there is the potential to damage historic heritage and sites of significance to tangata whenua in many locations on the Tauranga coast, the consideration of these important values should be part of all decision making processes.

⁴ Tauranga City Council, Draft Coastal Structures Policy, pg. 3

16. HNZPT **seeks** (addition underlined) the following amendment to ensure that the criteria of Schedule one is part of all decision making processes related to this Policy on both public and private land and for hard, soft engineering or managed retreat solutions. That the title of Schedule one is amended as follows; *"Schedule one: Criteria to be considered as part of all decisions on structures management."*

HNZPT **submits** that amendments should be made to the draft Policy by including the matters set out in this submission to address risks to mana whenua and historic heritage sites and values that may arise as part of works undertaken under the draft Policy.

We welcome any queries that you may have on this feedback. Please contact Carolyn McAlley, on 07 577 4535 in the first instance.

Yours sincerely



Ben Pick
Area Manager- Lower Northern

Address for service

Heritage New Zealand Pouhere Taonga
Lower Northern Office
PO Box 13339
Tauranga, 3141
Ph: [REDACTED]
Email: [REDACTED]
Contact person: Carolyn McAlley



P.O. Box 2 Whaingaroa Raglan 3265

Email: [REDACTED]

[REDACTED]

Tauranga City Council,
Private Bag 12022,
Tauranga 3143.

[REDACTED]

Re: Draft Coastal Structures

Submission of Surfbreak Protection Society (SPS) to Draft Coastal Structures Policy

SPS support most of the updated Coastal Structures Policy but do note that there is no mention of effects to archaeological and cultural areas as in the 2006 policy. SPS maintain that Council has failed to give effect to Section 5(2), s 6(e)(g) s7(a)s8 of the RMA 1991.

SPS seeks that the effects to archaeological and cultural areas are added into the Schedule one criteria as such:

- *Effects of the coastal structure on archaeological and cultural areas*

SPS do support 4.1 to manage effects of coastal erosion and the provision of public access as a Schedule one criteria along with support for 5.1.6.

SPS do note that there is no mention of effects to surf breaks despite the provisions set out in the Bay of Plenty Regional Coastal Environment Plan. Regionally Significant surf breaks are identified in the Bay of Plenty Regional Coastal Environment Plan in policy 7. 1.1, Schedule 5 -Regionally Significant Surf Breaks and Definitions. (please note appendix 1,2,3 below)

SPS seek inclusion of:

- *Policy*

Any decision to remove, install, maintain, or renew a hard protection structure will include consideration of whether the activity will create adverse impacts to the regionally recognised surf breaks.

Inclusion into 9. Schedules

Schedule one: Criteria to be considered as part of decisions on structures management

Criteria

- *Effects of the coastal structure on regionally recognised surf breaks*

Conclusion

SPS acknowledge that hard structures could cause adverse end effects along with erosion of coastal margin areas. Furthermore, hard structures may alter the ecological, biological and physical characteristics of a shoreline plus impact on the swell corridor and hydrological processes. Therefore, SPS do support soft engineering methods.

SPS have concerns relating to either the creation of, or removal of hard structures and other structures as identified in the definitions. While 4.1 does take into account the management of effects, SPS do have concerns of any dredging, removal, agitation of mud and sediment transport during the operations.

Recommendations

Add into policy section

- *Policy*

Any decision to remove, install, maintain, or renew a hard protection structure will include consideration of whether the activity will create adverse impacts to the regionally recognised surf breaks.

Additions into the Schedule one

Criteria as such:

- *Effects of the coastal structure on archaeological and cultural areas*
- *Effects of the coastal structure on regionally recognised surf breaks*

SPS wish to appear at the Hearing

Malibu Hamilton
Secretary
Surfbreak Protection Society
P.O. Box 2 Whaingaroa Raglan 3265

[REDACTED]
[REDACTED]

Appendix 1

7.1.1 Surf breaks

Policy RA 1 Protect access to, and use of, the regionally significant surf breaks identified in Schedule 5 (Regionally Significant Surf Breaks), by ensuring that:

- (a) Any activities requiring resource consent that have the potential to have a significant adverse effect on the quality of, or access to, these surf breaks, on a permanent or ongoing basis are avoided;
- (b) Any activities in the coastal marine area requiring resource consent that are proposed within a 1-kilometre radius of the surf breaks as mapped in Schedule 5 clearly demonstrate that the proposed activity will not have a significant adverse effect on wave quality, consistency or rarity or values associated with natural character (such as coastal processes, currents, water levels and seabed morphology), amenity or cultural heritage that contribute to the characteristics of the surf break; and
- (c) Other adverse effects on regionally significant surf breaks and their swell corridors are avoided, remedied or mitigated.

Appendix 2 -Definition

Surf Break: A natural feature that is comprised of swell, swell corridors, currents, water levels, seabed morphology, and wind. The hydrodynamic character of the ocean (swell, currents and water levels) combines with the seabed morphology and winds to give rise to a 'surfable' wave

Appendix

Schedule 5 – Regionally Significant Surf Breaks

Regionally recognised surf breaks in the boundaries of Tauranga City Council

- 5 Matakana Island (Puni's Farm) Map sheets 8b, 9b
- 6 North West Rock, Mauāo Map sheets 9b, 11b
- 7 Main Beach, Mount Maunganui Map sheets 9b, 11b
- 8 Shark Alley, Mount Maunganui Map sheets 9b, 11b
- 9 Tay Street (Mount Coast) Map sheet 12b
- 10 Arataki (off Girven Road) Map sheets 12b, 14b
- 11 Pāpāmoa Beach ('the Domain') Map sheet 14b
- 12 Motiti Island (east side) Map sheet 43b
- 13 Kaituna Cut Map sheet 16b

Emma Joyce

From: automated-message@tauranga.govt.nz
Sent: Thursday, 14 November 2019 2:01 PM
To: .submissions; [REDACTED]
Subject: Have your say on the draft Coastal Structures Policy quick survey
Categories: Coastal Structures

Thank you for completing the draft Coastal Structures Policy quick survey



A copy of your feedback follows.

When we decide whether to remove, install, maintain or renew a coastal structure, do you agree we should prioritise the structures that protect most essential public assets (like water and wastewater pipes, and essential roads)?: No, I disagree

Do you agree with allowing private landowners to take over the ownership and maintenance of a hard protection structure, or build a hard protection structure on Council land, to protect their property?: No, I disagree

Any comments: Council should be responsible for all publicly owned seawalls or coastal structure. It private properties benefit disproportionately, a targeted rate could be considered through the LGA policy process.

Name: Cogito Trust

Email: [REDACTED]

Suburb: [REDACTED]

Do you wish to speak at a committee hearing in support of your submission?: Yes

Phone: [REDACTED]

Emma Joyce

From: automated-message@tauranga.govt.nz
Sent: Sunday, 17 November 2019 3:44 PM
To: .submissions; [REDACTED]
Cc: [REDACTED]
Subject: Have your say on the draft Coastal Structures Policy quick survey

Categories: Coastal Structures

Thank you for completing the draft Coastal Structures Policy quick survey



A copy of your feedback follows.

When we decide whether to remove, install, maintain or renew a coastal structure, do you agree we should prioritise the structures that protect most essential public assets (like water and wastewater pipes, and essential roads)?: Yes, I agree

Do you agree with allowing private landowners to take over the ownership and maintenance of a hard protection structure, or build a hard protection structure on Council land, to protect their property?: Yes, I agree

Any comments: The Coastal document is a very basic report which has not had any exact details to work from and the resulting report is rudimentary in extreme. For example 1-10m inundation levels for 100 years is a variance of 90% which demonstrates this. The Councils advice and process has been extremely poor to date and as this has major potential to end up the the Courts it is very important for both Council and effected landowners that in depth consultation is followed. For example there have been NO SUBMISSIONS by effected parties like the insurance Industry- those with seawalls or other mitigating structures. The report excludes Council seawalls but has not researched or included private seawalls. The fact that Council is wishing to establish policy from one extremely basic report is dangerous and will create major issues int he future.

Name: Mike Olsen

Email: [REDACTED]

Suburb: [REDACTED]

Do you wish to speak at a committee hearing in support of your submission?: Yes

Phone: [REDACTED]

Emma Joyce

From: automated-message@tauranga.govt.nz
Sent: Sunday, 17 November 2019 5:35 PM
To: .submissions; [REDACTED]
Cc: [REDACTED]
Subject: Have your say on the Draft Coastal Structures Policy

Categories: Coastal Structures

Thank you for your feedback on the Draft Coastal Structures Policy



A copy of your submission follows.

Your feedback: I do understand why the Council is making these proposals but as with all changes it is the fine detail that can make a huge difference in the future, particularly in this case, for the home owner. I would like to know what flexibility the Council will have in deciding what constitutes 'essential maintenance'? Too often the responsibility is transferred to the rate payer with no recompense to the owner who may spend thousands on retaining council property. I also object to the environmental impact that the council seems willing to overlook. Over the years the estuaries have become clogged with silt from reserves that council have not maintained and now spend a considerable amount of money having to clear the over growth of mangroves.

Do you wish to speak at a committee hearing in support of your submission: Yes

Name: Jennifer Custins

Suburb: [REDACTED]

Email: [REDACTED]

If yes, please provide your phone number: [REDACTED]