

Sub. number	Name	Suburb	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)	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?	Any comments
1	Ella Shirley	Mount Maunganui	Yes, I agree	No, I disagree	Shouldn't that be the Council's responsibility to ensure consistent compliance to high standards? Privatising the protection of public spaces seems like a recipe for disaster.
2	Pauline Toye	Brookfield	Yes, I agree	No, I disagree	Landowners have to pay enough rates on top of their mortgage, so they shouldn't be penalised for having this extra maintenance & cost
3	Dan Boswell	Brookfield	Yes, I agree	No, I disagree	I think that people purchasing property at risk of natural hazards should have to mitigate the hazards solely on their own land. Building these structures on council land could restrict public use of that area. They should have done their due diligence and assessed the risks. Council and other ratepayers should not bear any burden for their choice to live in riskier areas.
4	Ian Grace	Papamoa	Yes, I agree	Yes, I agree	Private landowners who gain area from taking over council land should compensate council for the value gain of the land/structure acquired.
5	Heidi Fraser	Welcome Bay	Yes, I agree	Yes, I agree	
6	Gill Doms				How about reclaiming the public walkway area stolen by the householder in Welcome Bay/Forrester Drive before you start thinking about new stuff???
7	Scott Parker	Judea	Yes, I agree	Yes, I agree	Policy clause 5.2.6 should provide a bit more clarity for new sea walls about what an “approved structure” is when adjacent other neighbouring sea walls, so that adverse effects are not shifted to neighbouring property, public or private.
8	Lyn	Papamoa	Yes, I agree	Yes, I agree	In agreement with the 2nd proposal the landowner must have guidelines to follow, unless he/she can give logical reasons why he/she feels her way is better. Council should not block an idea just because it 'doesn't fit' their ideas. The needs of all need to be considered
9	Graham Henry	Matua	Yes, I agree	Yes, I agree	
10	Wayne McIndoe				I have your letter. If private owners take over maintenance of structures that Council exempts itself from responsibility of upkeep does that mean we are still fleeced by council on matters of consent, RMA, Health and Safety and other issues thought up to make money? For 30 years I have been cleaning up the east side of the Waimapu estuary at my cost. Given that I have removed the bulk of the accumulated rubbish and recycling it's now just regular upkeep. The only cost to council has been occasional removal of stuff by City Care when it's too much for my bin. The point I'm making is that council already benefits from volunteer work which often goes unnoticed so hitting people with other costs is a double wammy. By the way. Over TEN years ago I notified council that the steel handrails to the ROW steps next to my property are rusted through. Then about FIVE years ago some ladies from the council photographed the fault and said something would happen. When is that likely to be? I'm getting old – it would be nice to think that repairs happen before I die.
11	Emma Cooper	Tauranga South	Yes, I agree	No, I disagree	
12	Andrew Sommerville	Bethlehem	Yes, I agree	No, I disagree	Council should not pay to protect private property nor should owners be able to build hard protection structures. This will only lead to further problems further down the coast.

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13	Chris Doms	Welcome Bay	Yes, I agree	No, I disagree	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.
14	Neville Nicholson	Western Heights	Yes, I agree	Yes, I agree	Hi, We have been maintaining the council seawall in front of our property for a number of years. Your council staff carried out repairs that to be frank was rather useless Their repair work failed so we dug out behind the wall and installed a liner to stop erosion and further deterioration of the stone seawall. we are happy to continue carry out any future maintenance on the seawall at 17 Forrester Drive,Welcome Bay. Kind regards Neville
15	Harald Staude				<div></div> , Matua: 1) If council relinquishes ownership, I would be willing to consider protecting our Harbour frontage, and the public would be prevented from using such. 2) If not, I would allow frontage to erode to our property line and then consider protecting it. In either case the public would no longer have access.
16	Barry Benton				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.
17	Robyn	Judea	Yes, I agree	No, I disagree	council is responsible for looking after boardwalks and drains out to sea, building culverts and wall structures is what we pay our exhorbitant rates for, otherwise the council gets another free ride from the ratepayers.

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18	Barrie Trotter	Parkvale	Yes, I agree	Yes, I agree	There needs to be given consideration to whether a landowner can afford to take over the responsibilities of an existing structure where that landowner's property is in danger of damage if the council were to stop maintenance. It would be an unfair imposition on a landowner to assume responsibility were damage to be seen to be inevitable. It would likewise be unfair were the removal of a structure likely result in future damage. Possible solutions could be related to the current tenure of the affected property where current owners are protected, but future owners would need to accept responsibility on purchase of the property.
19	Stuart MacDonald	Tauranga	Yes, I agree	No, I disagree	agree that the maintenance and upkeep to be provided by private owner although the details about "allowing private landowners to take over the ownership" appear vague is this land therefore transferred to the title holder seems like a fast way to promote a landgrab. agree that prevention of erosion and loss of land and value is essential and that it should be allowed with appropriate consenting and environmental impacts considered. this should be provided as owner pays or a mix of owner/ratepayer if protection structure allows public access eg proposed memorial park - CBD walkway
20	Fletcher Dumbar	Tauranga	No, I disagree	No, I disagree	The queens chain is owned by Govt/council and as the owner it is there requirement to maintain the assets to protect the land. You are paid via rates to provide this service and now you are try to get out of your responsibilities As a owner of a property on an water estuary water front I have to pay massive rates, the last 2 years alone I have had a 14.9% rates increase. That is crazy! Now you are trying reducing the services I pay for while continuing to charge massive rates. Protection structures are council responsibility, own up to it.
21	Vladimir Tkachenko	Otumoetai	Yes, I agree	Yes, I agree	
22	Candy	Greerton	Yes, I agree	Yes, I agree	
23	Phil Bourne	MT MAUNGANUI	Yes, I agree	Yes, I agree	On item 1, yes essential assets as stated require regular attention especially roading around Tauranga and particularly the Mount area where potholes are frequently left. If it means using better road surface materials like bitumen to have a longer-lasting road then yes even more important. Too many main roads like Oceanbeach have used chip done hastily and fails. On item 2 yes BUT ONLY if Council provides guidelines as to what is acceptable and what is not.
24	Matehaere		Yes, I agree	No, I disagree	

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25	Rob Poad	Tauranga	Yes, I agree	Yes, I agree	Serious this is a waste of money. Sea level rises for NZ are 1.8mm a year for the last 100 years. Let's pretend that's not true, if sea level rises the 1m as we are told, are your walls going to help as the areas will be below sea level? when a storm hits like near the new hospital walls the area will fill with rain water as it has no where to go. So additional expense of pumps and generators need to be installed for the sea wall to have any use. Do you actually engage your brain?
26	Jodie Moore	Otūmoetai	Yes, I agree	Yes, I agree	
27	Mark Ward	Welcome Bay	No, I disagree	Yes, I agree	
28	Patrick Farrelly	Merivale	No, I disagree	No, I disagree	I strongly support managed retreat as a preferred option, endlessly pouring money into maintaining infrastructure is not a solution, neither is private landowners building shoreline hardening structures. Managed retreat for both private and community assets with indigenous ecological restoration solutions is the soundest way forward for long term, cost effective and practical, beneficial outcomes.
29	Peter Hosie	Arataki	Yes, I agree	Yes, I agree	
30	Graeme Fair	Oropi	Yes, I agree	Yes, I agree	Protection - not land acquisition
31	Bernadette Guzzo	Poike	No, I disagree	No, I disagree	Very unfair to fob off responsibility for what is only minor maintenance for you and leaving it in a state for private owners to deal with-specifically windermere reserve sewer line/stream. This has been blocked for some time and is a total mess!
32	Jan Jameson	CBD	Yes, I agree	Yes, I agree	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.
33	Peng Wang		Yes, I agree	Yes, I agree	
34	Melita Lawn	Otumoetai	Yes, I agree	No, I disagree	
35	Mary Capamagian	Tauranga	Yes, I agree	No, I disagree	I've said "disagree", because I think one needs to have a thorough discussion re the implications. Has it been done elsewhere in the world - can we learn from others' experience. If a private person is going to maintain or build on council land the contract would have to be carefully worded and the council may need a charge against the private person's property collateral to the contract.

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36	Adrian Muller	Papamoa Beach Tauranga	Yes, I agree	No, I disagree	<p>I see this as applying to the base Track of Mauao which has been in need of repair for over two and a half years now.</p> <p>Why is the TCC doing s survey like this when this Track is crying out to be repaired, or rather the 1 million locals and tourist visitors who have to negotiate the temporary steps, (or turn back the way they came if the steps are too difficult)</p> <p>The land is already in a type of private ownership as Mauao has been gifted back to the tangata whenua. They will not be in any position to pay for the repairs, so the TCC should get on to it immediately.</p> <p>If you deem my comment to relevant to you survey, then I would be most happy to speak to your committee.</p>
37	Ray Lowe	Tauranga	Yes, I agree	Yes, I agree	
38	Mark Apeldoorn				<p>I support the draft policy with amendments.</p> <p>I am concerned the policy as written does not adequately provide for:</p> <ul style="list-style-type: none"> - a collaborative response in partnership with other agencies; - protections or responses that may be most effectively implemented on adjacent unowned or administered land; - continued community access, amenity and use of areas that may be unowned, but for which there is a valued benefit to the community; and - the cost efficiency that may be derived from soft protections on unowned/unadministered land that has the potential to provide long term protection of Council owned/administered reserves and structures.

M Apeldoorn Submission

I support the draft policy with amendments.

I am concerned the policy as written does not adequately provide for:

- a collaborative response in partnership with other agencies;
- protections or responses that may be most effectively implemented on adjacent unowned or administered land;
- continued community access, amenity and use of areas that may be unowned, but for which there is a valued benefit to the community; and
- the cost efficiency that may be derived from soft protections on unowned/unadministered land that has the potential to provide long term protection of Council owned/administered reserves and structures.

DRAFT COASTAL STRUCTURES POLICY



Policy type	Council		
Authorised by	Council		
First adopted	26 October 2006	Minute reference	M06/109.4
Revisions/amendments	Add years	Minute references	
Review date	This policy will be reviewed in three years or when required.		

1. PURPOSE

- 1.1 To guide decision-making on the current and future management of council-owned or administered coastal structures.
- 1.2 To ensure planned management of all coastal structures along the coast and in the inner harbour is responsive to current and future coastal effects.

2. SCOPE

- 2.1 The policy applies primarily to the management of coastal structures and environments on council- owned ~~or~~ administered or adjacent land in the inner harbour and coast.
- 2.2 Nothing in this policy should be taken as overriding district or regional plans produced under the Resource Management Act 1991.

3. DEFINITIONS

Term	Definition
Activity	Has the same meaning as in the Local Government Act 2002.
Coastal effects	Refers to any one or more of the following inundation, storm surge, degradation of the coastal structure, or erosion of the a coastal structure's footings <u>or erosion of a coastal environment providing protection to the coastal structure or adjoining Council owned or administered environment.</u>
Council	Refers to Tauranga City Council - the elected member body representing Tauranga City.

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Coastal structures	Any building, equipment, device, or other facility made by people and which is fixed to land, including land covered by water and the airspace above land. This includes wharves, jetties, seawalls, buildings, or structures built on wharves or jetties, moorings, ramps, rafts, pipelines, breakwaters, groynes and other wave attenuation devices, and cables and transmission lines laid on, over (including in the air space above) or under the foreshore or seabed.
Esplanade reserve	Has the same meaning as in section 229 of the Resource Management Act 1991.
Hard protection structures	It includes a seawall, rock revetment, groyne, breakwater, stop bank, structure retaining wall or comparable structure or modification to the seabed, foreshore or coastal land that has the primary purpose or effect of protecting an activity from a coastal hazard, including erosion.
Private or commercial benefit	Is where the benefit of a coastal structure relates to non-Council activities, non-Council assets, or is required to protect non-Council land.
Responsibility	It is to accept ownership of a coastal structure and the implications of ownership including compliance with legislative, financial, asset management, managerial, and operational requirements.
Significance	Has the same meaning as in the Local Government Act 2002
Other structures	Refers to coastal structures with primarily a recreational or amenity benefit that do not serve to protect land from erosion or coastal effects. This includes wharves, jetties, buildings, ramps, or other structures built on wharves or jetties.
Soft protection	It includes a range of options, such as beach replenishment or nourishment, planting or dune care, intended to work with natural processes rather than against them to protect an activity or environment from a coastal hazard, including erosion.

4. PRINCIPLES

- 4.1 The role of Council is to manage the effects of coastal erosion on council-owned or administered land.
- 4.2 Planning effectively for the future management of coastal structures requires consideration of the interests of both current and future communities, and the effects of climate change and erosion.
- 4.3 It is appropriate for Council to reduce the number of hard protection structures, and evaluate the continued existence and maintenance, of all coastal structures in its management. There may be instances where Council decides to remove coastal structures, including hard protection structures protecting Council land from erosion.
- [4.4 Council recognises the merits of working with the forces of nature in the way it responds to coastal effects.](#)
- [4.4.5](#) Council is not legally obligated to protect private land from naturally occurring coastal erosion.

4.6 The purpose of a hard protection structure is to protect an existing or future Council activity or level of service and not to guard against future potential sea level rise.

4.54.7 The purpose of a soft protection structure is to protect an existing or future Council activity or other valued community environment or level of service in a way that provides for a natural environmental response.

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5. POLICY STATEMENT

5.1 Policy on coastal structures that are the responsibility of Council.

- 5.1.1 Council will install and/or maintain hard or soft protection structures where necessary to protect three waters infrastructure.
- 5.1.2 Council will prioritise the protection of transport infrastructure that is most essential for the long-term functioning of the transport network. Council may, in some instances, decide not to maintain hard protection structures supporting transportation infrastructure.
- 5.1.3 Council will consider the significance of the activity protected by a hard protection structure prior to deciding to remove, install, maintain, or renew a hard protection structure. Council will also consider the significance of the area to mana whenua in determining management options.
- 5.1.4 Any decision to remove, install, maintain, or renew a hard protection structure will include consideration of whether the activity can exist without a hard protection structure. This could include moving the activity (managed retreat) or prioritising soft protection measures. Council will also consider the criteria at schedule one of this policy when determining management options for hard protection structures.
- 5.1.5 Any decision to remove, install, maintain, or renew other coastal structures will include consideration of the significance of the structure and the criteria at schedule one to this policy.

5.1.6 Council will prioritise the protection of esplanade reserves that provide, or have the potential to provide, continued public access around the coast.

5.1.65.1.7 Council will work collaboratively with other government authorities to prioritise soft protection in areas adjacent to esplanade reserves to minimise the long term cost impacts of hard structure responses.

5.1.75.1.8 Council will consider the ability of the wider community to fund the whole of life costs of a coastal structure when determining if a new coastal structure is required.

5.2 Policy on coastal structures that provide private benefit

- 5.2.1 Council does not accept responsibility for coastal structures with primarily a private or commercial benefit. This includes hard protection structures where the primary benefit is the protection of private property or commercial interests.
- 5.2.2 Council does not build or maintain coastal structures where the primary benefit is promotion of private or commercial interests, or the protection of private property or commercial interests.
- 5.2.3 If a coastal structure which is for private or commercial benefit is located on esplanade reserve, Council may allow it to remain in situ unless it is deemed unsafe, was constructed without permission, impedes public access, or otherwise interferes with the purpose of esplanade reserves as outlined in section 229 of the Resource Management Act 1991.
- 5.2.4 Council may permit private landowners to maintain existing hard protection structures

on council-owned land where it has been determined that the hard protection structure does not protect a significant activity, or where the primary benefit is the protection of private property or commercial interests.

- 5.2.5 Council may allow the construction of new hard protection structures on Council-owned land to protect private property.

- 5.2.6 Hard protection structures maintained or built under clauses 5.2.3, 5.2.4, or 5.2.5 of this policy must be maintained to an approved standard at the cost of the private landowner, and be consistent with current council policy. Where a private landowner enters into an agreement to maintain a hard protection structure, this will be recorded on the property title.

Note: Landowners are required to obtain all necessary consents and approval from Council prior to construction or maintenance of any hard protection structures on Council land.

- 5.2.7 Council does not permit other structures to be constructed on council-owned or council administered land.
- 5.2.8 Council will note the risk of erosion on Land Information Memorandums (LIMs).

6. RELEVANT DELEGATIONS

- 6.1 The Chief Executive or their delegate is responsible for the implementation of this policy.

7. REFERENCES AND RELEVANT LEGISLATION

- 7.1 Local Government Act 2002
Resource Management Act 1991

8. ASSOCIATED POLICIES/PROCEDURES

- 8.1 Encroachments onto Reserves Policy

9. SCHEDULES

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

Criteria
The purpose of the reserve or valued community environment , particularly if it is an esplanade reserve acquired for public access
The community benefit derived from use of and access to a reserve or adjacent environment
Effectiveness of the coastal structure in preventing erosion (does not apply to other structures)
Effects of the coastal structure on the environment
Health and Safety
Community views
Alternative options to hard protection structures (does not apply to other structures).

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39	Alexander Sutherland	Welcome Bay	Yes, I agree	Yes, I agree	<p>We, the following. agree with the option to hand over ownership and maintenance of coastal structures to private landowners. We would like to add that:</p> <ol style="list-style-type: none"> 1. Under this change, we are assuming that landowners will bear the cost for building and/or maintaining structures. There should be recognition of these costs. 2. Our submission is that if planning/consent costs are involved, these should be waived or covered by Council, not by landowners. 3. Where existing stormwater pipes and unstructured outlets are present in existing walls, Council should provide advice and contribute to the maintenance and upgrading of these. 4. The Waitaha wastewater outlet should be re-routed so that the water flow does not undermine structures in the Azores Way or neighbouring properties are; or result in dirty waste water flowing into this area. <p>Alexander Sutherland, [REDACTED], Welcome Bay Alison Blain, [REDACTED] Welcome Bay Karen Moses, [REDACTED] Welcome Bay Eve Tregarthan, [REDACTED], Welcome Bay</p>

4th November 2019

Emma Joyce
Policy Analyst
Tauranga City

Dear Emma

Thank you for your letter 14th October 2019.

It is appreciated that you are going to maintain your most significant public assets regarding seawalls and other structures. I front onto the lovely walk way on the inner harbour and it is used constantly with children biking to school, walkers and many many dog walkers. It is lovely to see and when in the garden often have talks and communications with the dogs and their owners.

I have not long been at this property, and have had [REDACTED] and her [REDACTED] round earlier this year to clean up dead and noxious trees etc and they have been so helpful. While they were here I pointed out and we discussed that part of the sea wall is leaning out and crumbling and if it gives way it would then become a real major job to reconstruct. Some corners have completely washed away. They were going to pass on this to the right department. I don't know if anyone has had a look but my suggestion would be that it would be better now than later.

I was able to enjoy a beautiful walk last Monday around the Waikareao Estuary and was very impressed to the new rock walls and very wide pathway all metalled being used extensively by all. Last time a number of years ago I biked this and it was just a track very tricky but still great now it is just a dream. Perhaps this is something that could be done along this walkway as it is used by so many.

Perhaps in your roll you may direct this concern to the right department and it could be put into the planning budget.

Many thanks
Robyn Willis

[REDACTED]
Tauranga South
[REDACTED]
[REDACTED]
[REDACTED]

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41	Paul	Tauranga	No, I disagree	No, I disagree	Sounds like a convenient way of saying that your going to stop any maintenance and make it someone elses problem. We pay rates for this maintenance so do the job that is required.
42	Ria Phillips	Papamoa	Yes, I agree	No, I disagree	I agree that private owners should be able to take ownership of existing structures HOWEVER I do not agree that they should be able to build any new structure on council land. How will you ensure anything built doesn't encroach on the rights of all rate payers? If the private land owner has property that is at risk of erosion, especially in the future with climate change, the council should be making long term plans now to relocate these people. Any coastal structure is by definition temporary, and may not even work, so I do not believe any action of this type is in the best long term interests of the general public, or even that private land owner.
43	Peter Hosie	Arataki 3116	Yes, I agree	Yes, I agree	
44	Richard Griffiths	Pyes Pa	Yes, I agree	No, I disagree	Sensitive lifeline infrastructure must be protected for resilient city. I'm not necessarily opposed to private ownership of structures but it's potentially quite subjective and it should be assessed as to whether property is worth it, and of course subject to effects assessment for new structures. Hard protection structures should be last port of call.
45	Matt Price	Pyes Pa	Yes, I agree	Yes, I agree	
46	Eruera Tuhakaraina	Te Puna	No, I disagree	Yes, I agree	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
47	Adam Macfarlane-Hill	Tauranga	Yes, I agree	No, I disagree	
48	Chris Doms	Welcome Bay	Yes, I agree	No, I disagree	No, we are already losing too much public land to private waterfront land owners who are taking de facto ownership of our waterfront. Council should not be tipping the scales further in favor of private interests over our public waterfront spaces.

7 November 2019



Dear Sir/Madam

Bay of Plenty Regional Council's submission to Tauranga City Council Draft Coastal Structures Policy

Thank you for the opportunity to comment on the above submission. The Bay of Plenty Regional Council does not wish to be heard on this submission.

For matters relating to this submission, please contact Stephen Lamb at stephen.lamb@boprc.govt.nz or 0800 884 881 ext. 9327.

Our Organisation

The Bay of Plenty Regional Council is responsible for the sustainable management of resources within the Bay of Plenty region. Our role is determined by Central Government through statutes such as the Local Government Act and the Resource Management Act, and is different from that of territorial authorities (district and city councils). Some of our key roles are:

- Regional planning for land, water quality and air quality;
- Setting environmental management policies for the region;
- Allocation of natural resources;
- Flood control;
- Natural hazard response;
- Soil conservation;
- Pest control / biosecurity;
- Public transport;
- Strategic transport planning;
- Regional economic development; and
- Strategic integration of land use and infrastructure.

Summary

Please find our detailed comments attached. We trust you find them constructive.

Yours sincerely

pp Stephen Lamb
Natural Resources Policy Manager

On behalf of:

Namouta Poutasi
General Manager Strategy & Science

Objective ID: A3414208

Comments from Bay Of Plenty Regional Council on Tauranga City Council Draft Coastal Structures Policy

1 Specific provisions that submission relates to:		2 Nature of submission		3 Bay of Plenty Regional Council seeks the following decisions
Page No.	Section Heading and Reference	Clarify the issues you are concerned about	Support/Oppose or Seek Amendments and Provide Reason	
All	Overall approach	Support the intent of providing clarity to consideration of coastal structures. Support TCC to work with their coastal communities to increase understanding of natural coastal processes and climate change.	Support the overall intent	

1 Specific provisions that submission relates to:		2 Nature of submission		3 Bay of Plenty Regional Council seeks the following decisions
Page No.	Section Heading and Reference	Clarify the issues you are concerned about	Support/Oppose or Seek Amendments and Provide Reason	
1, 3, 4	Scope, Policy Statement	Consideration should be given to consistency with the NZCPS, RPS, RCEP when TCC are making decisions on coastal structures	<p>Seek amendment to scope to add 2.2.</p> <p>Seek amendments to sections 5.1 and 5.2 and schedule 1</p>	<p>Amend 2.2 to direct the public that any works in the coastal marine environment require a resource consent application by the Bay of Plenty Regional Council.</p> <p>Addition of paragraphs under sections 5.1 and 5.2 and schedule 1 to read: Any decision to remove, install, maintain, or renew coastal structures will include consideration of the New Zealand Coastal Policy Statement, Regional Policy Statement, and Regional Coastal Environment Plan.</p> <p>Addition of words to 5.1.2 Council may, in some instances, decide not to maintain hard protection structures supporting transportation infrastructure and <u>consider managed retreat/relocation.</u></p> <p>Addition of words to paragraph 5.1.4 This could include moving the activity (managed retreat/ <u>relocation</u>)</p>

1 Specific provisions that submission relates to:		2 Nature of submission		3 Bay of Plenty Regional Council seeks the following decisions
Page No.	Section Heading and Reference	Clarify the issues you are concerned about	Support/Oppose or Seek Amendments and Provide Reason	
4	Note	It would be useful for both landowners and TCC staff to note the requirement of resource consents from BOPRC for coastal structures	Seek addition of additional note	Landowners (including Council) may require resource consent from the Bay of Plenty Regional Council and are encouraged to discuss plans with the Regional Council prior to making decisions on the removal, installation, maintenance or renewal of any coastal structure.

Sub. number	Name	Suburb	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)	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?	Any comments
50	Elizabeth Fish	Welcome Bay	Yes, I agree	No, I disagree	Not ownership rights. I agree with allowing people to be able to maintain structures adjacent to their properties at their own cost with appropriate resource consents. They should not be given ownership and they should not be allowed to restrict access to ratepayer land it is not theirs. This currently happens in Welcome Bay with a pathway that has literally been blocked by private landowners 'reclaiming' ratepayer land! It increases their untaxed property values but not their rateable land meaning less for the city.
51	Jim McMaster	Matua			<p>For the past 35 years we have lived @ [REDACTED] t in Matua, a virtual waterfront property with a two to three metre Esplanade Reserve between our boundary and HW, delineated by a solid rock-wall which I understand was constructed by the previous owner of the property.</p> <p>During this time, the Reserve, which is in grass, has been totally maintained by us without any involvement by either Council, City or Regional. In passing, I would mention the fact that there would appear to be a particularly "get out of jail free card" used by both Councils when issues around the Esplanade Reserve have been raised---it is ALWAYS, the "other Council". Not only is this frustrating, despite its "convenience" for both Councils, it verges on being all but dishonest.</p> <p>On a related matter, in 1997, a 15 metre set-back was imposed on all waterfront properties, reputedly to "preserve the natural character of the waterfront". This was entirely without any form of consultation and in fact it was a further NINE years before residents became aware of its existence. This remains a festering sore and should be resolved soonest. The suggestion that this was to maintain the natural character of the waterfront is all but laughable given the monstrosities which have been constructed within it over the years, presumably consented??, but if so, how can this be defended in the same light as "natural character" and one must question, (a) were consents actually issued for all those constructions, and (b), were they fully endorsed by Consent Compliance staff after inspections? In reality, for ANYTHING to be built within the set-back flies in the face of the stated reason for its imposition, either that, or this was nothing more than a mechanism for Council to charge exorbitant Consent fees for those wishing to build within the set-back?</p> <p>Returning to the question of Esplanade Reserves. It seems that TCC are now suggesting that they abdicate from responsibility in the case of residents wishing to protect, not the Reserve, but their properties abutting the Reserve by constructing retaining or seawalls @ the expense of the residents? This may sound fine but must be conditional:-</p> <p>(1) the title to the area must then pass to the owner of the property adjoining the Reserve.</p> <p>(2) There should be no Consent Fees involved.</p> <p>(3) For sound common sense reasons, any seawall construction MUST be to a consistent and engineering standard as opposed to some of the higglety-piggletyy constructions as seen around the Matua Peninsula, some of which are surely un-consented?</p> <p>(4) For those of us who already have a seawall in place, @ resident's expense, with a Reserve which has been maintained for many years, with absolutely nil Council contribution, perhaps it is appropriate for those residents to qualify for my point (1) above?</p> <p>In conclusion, Council's suggestion may well have some merit but this could become an extremely complex matter with many twists & turns. The fact that half of current EMs are newly elected should not be ignored and perhaps those without previous knowledge and understanding of the complexities of the issues need to take a walk around the areas under discussion before casting a vote for or against.</p> <p>Kind regards Jim McMaster [REDACTED] Matua</p>

Sub. number	Name	Suburb	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)	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?	Any comments
52	John Little	Bureta			<p>To whom it may concern</p> <p>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 :</p> <p>All these existing structures are located on / or about the Kulim Park foreshore and Kulim Road esplanade reserve area :</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>I can forward photographic evidence of all the above concerns.</p> <p>Regards John Little [REDACTED] Bureta TAURANGA [REDACTED]</p>

Sub. number	Name	Suburb	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)	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?	Any comments
53	Brian Scantlebury				<p>Am generally supportive of the proposed policy. But are concerned t ensure that consenting procedures become streamlined and efficient, and that these applications be given priority.</p> <p>There should be no costs attaching to the consenting process for residents to sure up council assets as the proposal envisages.</p> <p>The improved/streamlined consent procedures advocated should also be granted to residents who seek to protect their own properties.</p>



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

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Contact person: Carolyn McAlley

Sub. number	Name	Suburb	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)	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?	Any comments
55	WBWA				<p>1. If TCC are to abdicate the responsibility for protecting their assets (ie esplanade reserves) and then expect abutting property owners to take over care, management, and spend their money and presumability pay for consents, then we propose that TCC transfer the freehold to the abutting property owners.</p> <p>2. We request that TCC agrees to remove any inundation notices from property files where residents implement suitable erosion protection.</p> <p>3. We submit that supporting the proposed policy change must be on the basis that TCC undertakes to ensure that it will expedite and assist with any private consent applications and that TCC will cover the costs of such consent applications where they are essentially for the purposes of protection from erosion or inundation.</p> <p>4. We are seeking from TCC, its planners and councillors, a change in direction; we are asking for a new 'green' philosophy, one which puts the coastal environment before development and infrastructure; one that allows people to live in harmony and in balance with the environment. Rather than expend huge sums of money on the imposition of concrete, earthworks and tanolised timber walkways and cycleways upon the beaches and shorelines of our estuaries, TCC should use these resources to reverse the effects of decades of harm and neglect, to restore the health of the estuaries and to protect their ecology and native fauna. Such a new strategy also reflects the current thinking on the issue of global warming. Most scientists believe that sea levels will rise and that storm surges will become more common and many ecologists hold that our coastal and estuary faua will be among the first casualties of climate change. Faced with this threat, more and more people believe that there is an urgent need for communities to protect the habitat of traditional native fauna rather than encroach upon it or destroy it.</p> <p>5. TCC placed an up to 15 metre setback on private property beside estuaries without consultation on the grounds of protecting the nature character of these shorelines. Now that TCC planners have unveiled to the public plans to completely alter the natural character of the Avenues beach by covering it with wood, concrete and/or earth, it is obvious that the 15 metre setback was imposed not on the grounds of protecting natural character but rather as a pretext for TCC to impose on ratepayers' properties and lives. TCC has still not explained how they can have the moral right to place restrictions on our private properties under these hypocritical circumstances. This moral issue needs to be addressed in any discussion about coastal policy.</p>
56	Samantha Ramos	Welcome Bay	Yes, I agree	Yes, I agree	



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Tauranga City Council,
Private Bag 12022,
Tauranga 3143.
Email: emma.joyce@tauranga.govt.nz

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
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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

Sub. number	Name	Suburb	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)	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?	Any comments
58	Mirjam van de Klundert	Tauranga	Yes, I agree	Yes, I agree	
59	Cogito Trust	Mount Maunganui	No, I disagree	No, I disagree	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.
60	Janice Magee	Opotiki	Yes, I agree	No, I disagree	somewould be okay but others a mess so no.
61	Richard Ashton				Councils (Regional & local) should be responsible and maintain all coastal structures . Privatising the responsibility will result in breaches by some property owners leaving others hopelessly vulnerable . It's a public problem that demands a publicly funded response. Construction and maintenance must be controlled by personel with knowledge and expertise. The public can then demand access to and use of these areas as well.
62	Robyn	Judea	Yes, I agree	No, I disagree	Council passing the buck, died that mean our rates come down seeing as though you want us to do your work?
63	Nicola Baxter	Greerton	Yes, I agree	No, I disagree	No way should people be able to own access ways. The council need to keep ownership! And keep maintaining them

Sub. number	Name	Suburb	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)	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?	Any comments
64	Eamon O'Connor				<p>Date:15 November 2019 To: Tauranga City Council From: Tauranga Harbour Protection Society Inc Re: Submission on Tauranga City Council Coastal Structures Policy Review</p> <p>The Tauranga Harbour Protection Society Inc appreciate the opportunity to comment on the Council's proposed changes to the Coastal Structures Policy.</p> <p>We acknowledge that the TCC does not have the resources to manage the considerable coastline within its catchment area. This is evidenced by Council's inadequate response to coastal collapse and erosion such as that occurred at the end of Fourth Avenue in 2013. With global warming it is likely that harbour coastline will experience increasing erosion from rising sea levels and stronger and more frequent storm events. This will place even greater strain on TCC's limited resources.</p> <p>Consenting and Permission We understand the need for Council to control waterfront structures to ensure that they are designed and engineered for purpose. We consider that the aesthetics of any coastal structure is also important to ensure that visually any new structure is in harmony with the environment and the shoreline. The consenting and permission process should be streamlined to reduce cost and shorten the time these processes currently take. We suggest the following:</p> <ul style="list-style-type: none"> - Council should assist all coastal landowners by holding on file suitably pre-approved hard structure protection plans that meet Council design and engineering standards. These could be accessed and utilised by landowners thus reducing design costs for residents and process costs for Council. - The consenting process is currently truncated, arduous and expensive. It needs to be streamlined. - Council should waive fees relating to planning applications and resource consent when a landowner plans to build hard structures protection to protect their property and ensure adequate contiguous protection build on bordering Council land as well. All consenting processes should be streamlined to reduce costs. - Council should consider returning land taken as part of building consent/subdivision processes to the landowner. Many of the esplanade strips taken are steep coastal strips which are inappropriate for parks or public access. <p>Eamon O'Connor - Chairman Tauranga Harbour Protection Society Inc [REDACTED] [REDACTED]</p>

Sub. number	Name	Suburb	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)	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?	Any comments
65	Grace Burman c/o R & C Scott				<p>The proposal to require private residents to maintain and build hard protection structures on Council land to protect their property does not take away the requirements to obtain the necessary resource consents from both City and Regional Council (this is noted in the policy document under the 'note' section 5.2.6). Obtaining permission to build protection structures is currently onerous, arduous and expensive. It requires input from many expert consultants such as geotechnical engineers, planners and coastal processes engineers. Through this policy the land owner cannot provide hard structures easily and in a cost-effective manner in practice. The policy does not enable in a streamlined way any private resident around the City whose land adjoins the harbour to easily provide for protection on their property. Notwithstanding this, the effects on harbour erosion will extend further beyond private properties and therefore putting the onus on the private land owner is short sighted and not a long term solution to the problem.</p> <p>It is proposed that the Council take responsible for all seawalls that are on Councils land including maintenance and paid for from rates, including a targeted rate for the immediate private properties which benefit from the walls. This method is used by other Council's around NZ who have similar coastal erosion issues.</p>
66	Ann C Barry	Tauranga			i believe Council need to be responsible for all Council owned seawalls including maintenance, and paid for from rates as affect all of Tauranga coastal residential zoned and effecting all of Tauranga coastal residential zoned land and effects from seawall going beyond the immediate adjacent property.
67	R Sanders	Papamoa	Yes, I agree	No, I disagree	Council need to stay responsible for Key City Services and infrastructure (after all that is what there role is in the community) not abdicate from them like they have over time and rates still rise plus extra cost for services that have been outsourced i.e Rubbish Collection, Park Maintenance etc.
68	Mike Olsen	Fourth Avenue Tauranga. (I live in Paraparaumu at this stage and would need plenty of notice.)	Yes, I agree	Yes, I agree	<p>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.</p> <p>For example 1-10m inundation levels for 100 years is a variance of 90% which demonstrates this.</p> <p>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.</p> <p>For example there have been NO SUBMISSIONS by effected parties like the insurance Industry- those with seawalls or other mitigating structures.</p> <p>The report excludes Council seawalls but has not researched or included private seawalls.</p> <p>The fact that Council is wishing to establish policy from one extremely basic report is dangerous and will create major issues in the future.</p>
69	Jennifer Custins				<p>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'?</p> <p>Too often the responsibility is transferred to the rate payer with no recompence to the owner who may spend thousands on retaining council property.</p> <p>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.</p>
70	Ron Daldy	Matua	Yes, I agree	Yes, I agree	For existing structures a proforma consent could allow maintenance to be done on a regular basis, rather than an extensive and expensive process, than would tie up local authority staff and discourage regular and safe maintenance cycles.

Sub. number	Name	Suburb	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)	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?	Any comments
71	Rodney Fong				I live at [REDACTED], Bay of Plenty, Welcome Bay 3112. The council are proposing to put a walk way on the esplanade between my property and the coastal structure. I strongly oppose the walk way due to safety reasons. If you want a walk way the council should cover costs of maintaining sea wall as it is for the benefit of the public. If no walk way goes ahead then sure I will cover the cost of the sea wall. If I cover the cost of the sea wall then you should vest esplanade back to those who pay for the upkeep of the sea wall. You can not expect home owners to cover cost of protecting a sea wall that is providing a walk way for public benefit on council land.
72	Kathryn Lellman				Public access to the coast and harbour are an essential community amenity. the coastal inner harbour walkways are of huge benefit to our community, they provided recreation spaces, alternate transport routes (which frees up roads), green spaces and huge benefits to our community. The Council should be responsible for maintaining and protecting those and the seawalls etc that support them. Further, many of the public esplanades such as the Daisy Hardwick in our area were taken as reserves on the basis they would protect against erosion and Council would maintain them. The benefits of such areas needs to be protected and enhanced for the benefit of the whole community - such as the 120000 people a year who walk and cycle on the Daisy Hardwick and the huge numbers who use Kulim Park and the Matua Salt Marsh tracks. Many adjacent properties in our area are well back and high above the walkways and seawalls and the benefit to those private properties is far less than the overall community benefit.
73	Danielle Fong	Welcome Bay	Yes, I agree	Yes, I agree	<p>Hello,</p> <p>I find it hard to make a submission either way with this policy, not enough information is provided, things are not transparent.</p> <p>Obviously the council has been working on this a while so will have contingency plans and suggested options for what they would do at each address, as they must be assessing this on a case by case or street or area basis as to whether or not they will give the responsibility to the owners.</p> <p>It would be good to know if the council remains in control of the seawalls what will they fix them with - we have a stone wall, will they repair or replace??</p> <p>Are the repairs the council will do going to last the next 20 years or only 10 ??</p> <p>What are potentially the possible options for people to build structures to prevent erosion</p> <p>Joe blogs property owner doesn't know the building code or RMA so how can they make an informed decision about this policy?</p> <p>It would be nice if they outlined some options other than provided on a case by case basis.</p> <p>A lot of owners in our street have already been taking responsibility for the seawall (as well as the esplanade reserve) as the council has not done an adequate job in the past and it is in their best interest to protect their own property from erosion.</p> <p>Recently some seawalls have been repaired in Forrester Drive by the council, the impact this had on the environment was huge and the estuary has still not recovered. At the start they did not use properties as access points they drove huge tractors and trailers along the estuary (some of which got stuck)</p> <p>We complained and the council eventually ceased repairs until they found a property with a access to the waters edge. Why wasn't the impact on the ecosystem thought about at the start?? At least if property owners had the responsibility they could use their property as access, leaving the estuary mostly alone.</p> <p>If the responsibility is put on land owners some people may not be able to afford repairs/erosion protection, what will happen then? Both the council esplanade and property will be at risk. If one property is surrounded by people who haven't maintained or developed erosion protection erosion will eventually start to 'eat' into the property from the sides.</p>

Sub. number	Name	Suburb	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)	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?	Any comments
					<p>If the responsibility was given to land owners surely the idea of a walkway along the esplanade would be no longer??</p> <p>With what is provided and my context I think the responsibility should be given to the land owners, that way they can do the very best to protect their land.</p> <p>If you have any questions re my submission or wish to make comment please contact me on [REDACTED] or [REDACTED]</p> <p>Regards Danielle Fong</p>

Submission

There are no structures affected by this policy near my place, but when I got the letter I did not know that, and when I read it I felt lost and very afraid. So I understand how the people affected would be feeling. When it is your home at risk it is very scary, you feel lost, angry, helpless and deserted. Hence this submission.

The family home is your greatest investment, often taking 30-40 years of hard work to earn, and if you lose it you are likely not to be able to recover from the impact of its loss. That makes this policy change a very important one, as the potential to do so much harm to Tauranga residents lives must be taken very seriously.

The people affected by this policy bought their property in good faith, expecting that current protective structures would continue to be maintained as they always had. Suddenly that protection may be simply taken away, leaving them feeling very vulnerable and unprotected, and potentially with reduced property value through no fault of their own. Individuals don't have the resources or knowledge to identify potential problems until possibly too late, or to be able to come up with solutions that would work, let alone be able to pay for it by themselves, (or get all the people affected to agree to a solution and contribute to the cost), so they need help, and, as rate payers, they are entitled to it.

The reason used to take that protection away is that there will be a sea rise in the future. I understand that at the moment we are talking about 3mm per year – 10 years to rise 30cm - that gives us time to work this out. So why the harsh policy all of a sudden, putting people under considerable stress well before the full situation is fully known?

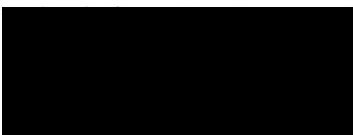
If the Council thinks the problem is greater, then I must question other decisions the Council has made – for example permitting housing developments on wetlands (Hairini) – won't they be even more affected by sea rise? (and did we learn nothing from Christchurch?). Someone said that people purchasing the risky properties would have to do due diligence – but what if they simply don't have the ability to understand? It is like letting someone walk in front of a bus as saying afterwards "they should have known better".

If climate change is a developing reality then it is likely to impact much more than sea level, so yes, we as a community need to prepare for it. But simply dumping some people in the deep end, removing what protection they currently have, does not really do it. Other solutions need to be found in collaboration with those affected.

We need leadership from the Tauranga City Council, good communication, developing good systems, preventative action, trust, and care to ensure the best outcome for all. Not sledge-hammer policies that leave rate-payers in the lurch and releases the Council from all responsibility. This policy needs review.

Regards

Hermione van Driel



From: [REDACTED]
Sent: Wednesday, 20 November 2019 3:33 PM
To: Emma Joyce
Subject: TCC erosion policy submission

Hi Emma

I am very sorry I have just realised I failed to put in a submission to on the erosion policy before the closing date of Sunday. If it is not too late for consideration, I have noted down a quick submission below outlining the key points we discussed when we met some weeks ago.

Many thanks, Kate

Submission on TCC Erosion Policy from Kate Graeme

[REDACTED]
Matua
Tauranga 3110

We own a property on the Matua foreshore at [REDACTED] and make the following submission -

We are generally supportive of the Erosion Policy and support the Council recognising the predicted impacts of climate change, and the need to plan for them and their ramifications for Council ratepayers. We support the intention of the policy to enable private property owners to maintain a structure on Council land where the Council has decided not to continue to maintain it. We accept that where the majority of the benefit of a structure is to private property owners they should bear the majority of the cost of protecting their asset.

We see the potential for some issues to arise, including structures in front of multiple properties being rebuilt in a piecemeal way which means public access is physically lost and new structures potentially creating erosion risks to neighbouring unaltered frontages. Multiple rebuilds also means multiple damaging trips by heavy machinery on the harbour. Ideally all of a frontage would be rebuilt as a single structure to ensure maximum longevity so that public access was able to be retained and so that the impact on the harbour from the build was minimised.

For structures previously maintained by the Council and where the Council has previously agreed to maintain them long term, an absolute shift of all the cost to private land owners is a complete change in approach. Where there is still some public benefit this could be recognised by the Council making some contribution to the cost.

We would like the Council to also provide in the policy -

- | The possibility for a 'middle ground' cost sharing approach between the Council and private property owners if there is still some public benefit to maintaining a structure
- | The potential for cost sharing arrangements such as targeted rates
- | A requirement for public access to be maintained over the reserve where possible

Yours sincerely

Kate Graeme

[REDACTED]