Western Bay of Plenty District Council

Hearing Schedule for the Inner Harbour and Coastal Erosion Management Draft Policy

Wednesday 10 May 2017

Time	Submitter	Submitter ID
10:30	**Josephine Richards**	LS 06
10:40	**Michael and Marion Troon**	LS 21
10:50	**John and Rosemary Roper**	LS 15
11:00	**Sylvia Zlami and Peter Ehrlich**	LS 18
11:10	**Simon Rose**	LS 14
11:20	**Tim Lander**	LS 22
11:30	**Shane Adams**	LS 25
11:40	**Abraham Janssen**	LS 03
11:50	**Mike and Jo Bassett-Smith**	LS 02
12:00	**Waterview Residents Group (Colin and Anne Andrews)**	LS 20
12:10	**Jenny Sutherland and Dr Johnathan Hope**	LS 26
12:20	**Janice Mayston**	LS 08
12:30	**Lia Tuerlings**	LS 33
12:40	**Omokoroa Environmental Managers (Karen Loten)**	LS 17

Summary of Submissions

Submitter	LS#	Stance	Submission
Shana C	1	Oppose	• I am completely opposed to the idea. • there is no legal requirement or precedent for council to be obliged to protect any public or private land from erosion. • the impetus for the project is from beachfront property owners along Shaw Road (is that true?). • I heard that it was in response to a requirement for those owners to move their houses/buildings in the event of a retreat in the shoreline, (is that true?). This would therefore be in their financial interest to have council and ratepayers build a rock wall for the protection of their private property. • I read that there are real effects on the beach and dunes around the now walled areas, because of the dynamics of the waves bouncing back off the wall in high tides. • I have noted the changes since the first rock wall was put in and notice "channeling" and holes in the surf, where it used to be smooth, and much safer for swimming. Has the safety of swimmers been taken into account, by the council in making this consideration? • The walls are unsightly and unattractive. They catch rubbish, debris, and dead things that stink, that are impossible to remove as they are wedged into the wall. • If the property owners want to build their own fortifications, it should be on their own private land, at their expense, completely. • Beach front owners of properties bought or built their homes in full awareness and cognisance of the risks of erosion, climate change events and tsunamis. They should not expect council to subsidise the protection of those properties, or permanently alter the landscape and dunes for their own personal benefit.
Miuke and Jos Bassett-Smith	2	Neutral	• Council walkway edge to be battered down and the Vetiver plant system to be used. • Horizontal pipe drainage to be carried out. • Retaining wall at base/toe of slip area.
Abraham Janssen	3	Somewhat Disagree	• Supports precautionary approach to new subdivision design mitigating future erosion issues • Existing structures should be maintained on a regular basis to avoid catching up costs when they break down. • These costs are to be carried by the Omokoroa population. The assessment proposed does not factor this in. • Doing nothing is not an option and may even create more problems. The adaptive approach and the holding the line approach should always be considered first because it is about protecting Omokoroa rather than protecting any owner's property.
Alison Glaister-Richardson	4	Somewhat Disagree	• Supports precautionary approach to new subdivision design mitigating future erosion issues • It is unclear how the assessment criteria will be applied in practice. • We are gravely concerned that the policy permits Council to abandon its assets including strategic assets. • The 'do nothing' approach should only be considered where property is not endangered. Council distancing itself from protecting private land by way of erosion mitigation [seems] neither feasible nor practicable and would impose an unreasonable burden on non-Council landowners. • We feel that the primary objective of the policy ("to provide certainty to the community" how Council will meet its obligations as a landowner regarding erosion mitigation) is not being met. The policy poses more questions than it answers and leaves us in the dark over the future of our local coastal amenities.
Alison Henderson	5	Somewhat disagree?	• ...a responsible council has a duty to ensure the protection of the special character of the Western Bay of Plenty, and the beautiful coastline is a very important part of that special character: ○ It is home to an abundance of important marine, bird, and plant life

			○ It has cultural significance for local Māori ○ It has the potential to bring tourists and other commercial growth into the area ○ It provides important recreational opportunities for the enjoyment of all residents and visitors • in times of climate change and potential sea level rise, and given the predicted changes in residential and commercial land use in the area, policies need updating. • We urge the Western Bay District Council to re-consider its policy and consider a collaborative management plan involving iwi/hapu, residents, volunteer/interest groups, corporate sponsorship, and local government, rather than expecting residents to have sole responsibility for the management of coastal erosion. • We believe that such a policy puts an unfair burden on coastal property owners, when the coastline is actually providing benefits to the wider population of the Western Bay of Plenty. That collective population/community actually should be making the decisions about the management of coastal erosion in partnership with the council. • It is not pragmatic to expect householders with properties that border the coastline to take responsibility for an entire coastline. Neither is it necessarily fair to impose an excessive rates burden on every resident. • Please include the continuing provision of the following services and actions in future policy: ○ Funded access to expert advice and professional consultation services ○ Continued monitoring of land run off flows, sea level rise, and at risk areas ○ Facilitation and encouragement of community/iwi participation in the management of coastal erosion ○ Co-ordination of individual management programmes; for example, stone walls as protection, the use of horizontal drains, and the use of native planting to combat slips and soil erosion ○ Further discussion of the possibility of land swap i.e. private property and reserves as has been done in other areas of Aotearoa ○ The implementation of collaborative funding of initiatives, with a mix of Western Bay District Council, Bay of Plenty Regional Council, private sponsorship (e.g., Port of Tauranga, local industry), home owner, community, iwi, and national government funding
Jo Richards	6	Support in part	• A much more conservative approach should be taken regarding future developments. • Houses should be built much further back from existing shorelines and cliffs. • The 20 metre boundary line of the esplanade reserve from the shore or cliff is not enough to allow developers to sell land up to this point. • Holding the line would be ideal. The walkways around the Omokoroa peninsular are often used and a great public facility it would be very good if these walkways could be retained, however I do realise that the erosion is a huge problem and whether of not it can be stopped requires expert assessment and assistance. • I agree with Section 6.1 • where possible the walkways should be retained by soft option (suggest not big tress planted at the top of the cliffs) but retaining vegetation used . A study could be done of the cause of the erosion and how to prevent further.
Val Hector	7	Support in part AND Somewhat disagree	• It is reasonable to consider a longer time span for any new development by for existing public assets such as walkways and reserves over a 30 year projection is more appropriate than the mentioned 100 years. we cannot anticipate that far into the future and we need to consider the continued well being of the present community. That wellbeing has to include continuing access to and protection of council owned walkways and reserves • While the 'do nothing' approach will sometimes be the appropriate choice, it should not be the default option for council owned land
Mas Mayston	8	Somewhat disagree?	• I wish to see our harbour protected from soil contamination. • I would like to see any slips having a gabian cage (or simular) asap placed around slipped soil, to limit the soil being washed into the harbour.

			• Also harbour edge where wave erosion is occurring, because of human clearing of the natural vegetation protection, to have gabian cage applied to hold the soil and slow the returning storm wave action. (example Cooney Reserve, Omokoroa) • I find Environment Bop hypercritical in their action to enforce farmers to fence waterways but leave their own waterway denuded and unprotected.
Maureen and Colin	9	Support in part AND Somewhat disagree	• Supports precautionary approach to new subdivision design mitigating future erosion issues • existing reserves, strips and walkways should be kept and maintained. They are an integral asset to Omokoroa and enjoyed by the local and visitors alike • I do not think there can be a blanket rule or answer BUT each case should be addressed individually • The existing Reserves and walkways make Omokoroa the place it is [and should be] maintained and looked after so that everyone can enjoy them. • Council land that just fronts a coastal Region with no-one using it could adopt a lesser protective stance. • Western Bay of Plenty District Council has a duty of care to protect and maintain our walkways and also a duty of care to make sure that these areas are protected from further erosion into private property. • The new policy of Council which permitted the Council to abandon strategic assets (Based on their (the Councils) assessment should not go ahead. • Horizontal pipes for drainage could be placed in the base of the cliff top walkway banks suffering erosion to help prevent further erosion and clay and mud pushed back into the cliff and the existing boulders pushed back into place.
Tim Cridge and Maureen MacKay	10	Parts of the Policy need amending as detailed below	• Global warming is now accepted and should be accommodated. • For new developments section 4.1 is fine. However some of the options listed in 4.2 are not appropriate where development has already been undertaken in the past and council have issued building permits .. • The do nothing option is only appropriate where no development is being affected in adjacent private ownership. • The adaptive approach allowing for the abandonment of 'strategic assets' will impact negatively on adjacent landowners. Adjacent landowners who have made investment decisions based on a history of maintenance of particular reserves should be entitled to notice with an acceptable long term time frame before any change to the maintenance of council land. • The adaptive approach as far as abandoning strategic assets is equivalent to Council having a fire on their property and taking no responsibility whatsoever to stop it spreading to yours. Should those adjacent landowners have any right to fight the fire/erosion on Council land to stop it further affecting theirs? Any right to do this, or a policy to work in a collaborative manner with Council, is not covered in this document. • The cause of the slippage on WBOPDC land is rainfall on the Omokoroa Peninsular not sea level rise. • The Policy Document relies heavily on the cost benefit analysis of various areas in the Opus Report "High Level Coastal Erosion Study". ["Omokoroa West, Omokoroa East and Omokoroa East Mid"] areas are ill defined making it difficult for the lay person to comment if the importance rankings mentioned are valid. These priority areas and rankings of importance need to be specifically outlined and mapped in the Coastal Policy document, not hidden away in a reference. • While Section 5 states that existing structures will be reviewed every 5 years with the first assessment in 2 years, the reality is that with the recent storm event March/April 2017, many of the existing structures / strategic assets eg parts of the Omokoroa Walkway, have been damaged and need repairing now to stop damage spreading further. Abandoning these strategic assets with no notice to adjacent owners affected is unacceptable. • The recent slippage has nothing whatsoever to do with sea level rise. It is the result of rainfall on WOPBC rated residential land. These two causes need to be differentiated in your Coastal Policy document, with perhaps different approaches for each. • a collaborative solution that would stop the slip continuing down the walkway, allow the continued usage of the beach adjacent to the public access at 26/27 Ruamoana Place and hopefully allow the walkway to be continued past these properties.
Submission	10.1		• With the increased population levels expected in Omokoroa, all access to walkways and beaches is vitally important to take the

by residents at 23,24,25 Raumoana Place			pressure off the Esplanade area. This [recent] slip has resulted in both the walkway and the beach being closed off to the public. • We believe it is in both the WBOPDC and the submitters' interests to put forward a proposal to do a best practice action plan now, jointly funded, and for immediate implementation, to prevent further losses. • The slipped area in front of 23, 24 and 25 Ruamoana Place is probably one of the most fixable with the highest public usage and gain as o The bottom of the slip has already been rocked. o The slip face is only up to 17.5 metres high compared to much greater heights in Bramley Drive and O'Donnell St. o Its position on the Omokoroa Walkway and its proximity to a highly used beach where usage is threatened by the current slip. o The residents' commitment and willingness to make substantial ad hoc financial contributions towards a permanent solution. • Our submission is that 'best engineering' practice be identified, planned, implemented, jointly funded with the affected landowners, and brought urgently into reality to solve this problem permanently. Such a solution would involve all elements of 'best practice' as far as is known, all used in conjunction to bring about a 'best possible' result in the immediate future: o Extensive PVC drainage of the Halloysite layer extending back from the slip face o Reduction of overburden height at the top of the scarp face to reduce the load and form more 'natural' angles o An engineered solution such as benched rock walls to hold the scarp for as much of their height as is desirable and possible. This would also allow access for installing the PVC drainage. We envisage a high rock-wall type structure on a suitable engineering angle (possibly 30-45 degrees) to hold back the upper slopes from further slip erosion, starting at a base such as the rock wall already installed by WBOPDC in this area. o Ongoing maintenance and improvement of sewage and stormwater systems of all adjacent properties to reduce surface water infiltration. o Ongoing maintenance of the sea-wall rock wall to prevent wave action erosion at the toe of the slope. o Fencing off dangerous slopes to allow safe access along the present cliff-top round the peninsula walkway. • The primary causes [of the recent slips] seems to be geotechnical in combination with adverse periodical rainfall events. A layer of Halloysite, buried approximately 10-15m deep at this location, becomes saturated with water from excessive rainfall and forms a lubricant layer for the overlying soils, trees and vegetation to slip off into the harbour. The rainwater collects in this layer, as it percolates through the overlying and freely draining soils, saturating it, and causing it to liquefy... This has resulted in a steep scarp leading from the height of the original slip, and a long tail of debris (up to 50 metres plus) including soil, plants and trees running out into the harbour. The scarp height in this area is around 20m above sea level. • Council has undertaken extensive but piecemeal erosion protection in the area. At no stage has the full armoury been employed in a coordinated solution. • The local area has reticulated sewage and a separate stormwater system into which almost all properties drain their household water. (Note: Soak-holes are particularly bad at concentrating roof water into the ground and have been decommissioned as a consequence of the stormwater system being installed). • In addition , the underlying Halloysite layer has been drained in front of adjacent residences to the east (numbers 26 & 27) and west (numbers 21, 20) by the installation of perforated PVC pipes in socks, penetrating this layer for up to 60m back from the slip. This seems effective at providing drainage and preventing further slipping, where it has been installed. It was unfortunately not installed in front of the submitters' residences. • WBOPDC has progressively built a rock wall 'bund' to stop basal cliff erosion by wave action just past these residences. The cost of this is reportedly $3000 per lineal metre, and is much appreciated. But it only prevents one source of erosion - wave erosion - and is ineffective against climatic rainfall events, such as recently experienced. • Efforts have been made in 2016 to reduce the overburden height at the top of the scarp face to reduce the load and form more 'natural' angles. However this was not completed and the slip started in the area not done.

			• In the case of 23-25 Ruamoana Place the time has now come for urgent action to stop the further erosion of WBOPDC reserve land, walkway assets, and their subsequent and consequential destruction of privately owned land. The time for Policy, Discussion, and any further inaction has now run out. • 'Best Practice' land stability and remediation must now be urgently undertaken to prevent further losses. Furthermore, the above submitters are prepared to make significant ad-hoc monetary contributions in support of WBOPDC activities to urgently bring this about. • The Inner Harbour Coastal Erosion Management Policy 2017 Section 7.3 states that Council recognises it has responsibilities under other legislation: o The Resource Management Act 1991 requires 'the maintenance and enhancement of public access to and along the coastal marine area'. o The Local Government Act 2002 requires 'managing the effects of erosion on Council assets . . . . . to meet the current and future needs of good quality local infrastructure in a way that is efficient and most cost-effective'. • An urgent plan of action is needed to address this issue and if possible prevent it happening. It is both a moral and statutory requirement for WBOPDC to mitigate such future events.
Bernadette Limbrick	11	Disagree	• Supports precautionary approach to new subdivision design mitigating future erosion issues • I feel that it should continue to be councils responsibility to protect the coastline for the benefit of all ratepayers – especially reserves and strips • I would like to see council continue to maintain and improve all of the coastal area within WBOPDC area. This would include areas in front of private land where there is council reserve land in front of private land. I think Council has a duty of care to protect and take preventative measures to ensure that we don't loose anymore land into the sea.
Suzane Ardern	12	Somewhat Disagree	• No future housing should be allowed on unstable land. • This land [owned by Council such as reserves and strips] should be maintained to help mitigate any further erosion e.g. retaining walls. • Council must have an obligation to maintain walkways etc so erosion doesn't encroach onto rate payers' land. • [Council] Must do something to stop further erosion.
Allan Roberts	13	Somewhat Disagree	• Supports precautionary approach to new subdivision design mitigating future erosion issues • [The option to] do nothing is unfair to the people whose land is adjacent to the Council's reserves. • During the Cook weather event I was watching Face TV with John Campbell interviewing somebody from the Opotiki Council when they said they had a worst-case scenario with steep slopes & giant Pohutakawa trees. The steep slopes we have to live with but the trees? • The councils current 'do nothing policy' has led to the trees now being at the foot of the Hamurama Rd Cliff, there are now few trees to protect and few trees to hold back erosion from any direction. • I believe the trees create large point loads on the weak land with the wet weather & wind helping to roll the trees starting the bigger slips above them. Had weight/height been taken off the trees this would have helped. Test for the bearing capacity of the land to determine an approximate maximum tree size the land can support. I'm sure this information would already be available so it would only take some calculations to have a guide rule that has some logic behind it. Consult the Opotiki council regarding their comments. • I have heard of roots dying back but this would be countered by the reduced canopy allowing younger trees to develop. I'm sure we have all tried to dig out old roots or around them, they don't just disappear even on dead trees. Even selective hard pruning would be an improvement on the mess at foot of the cliff. • I like the proposed walk way set 5-10 metres of the shore fall zones proposed by someone on the council website.
Simon Rose	14	Somewhat	• Agree [on precautionary approach to new subdivision design mitigating future erosion issues] to a point, this makes common

		Disagree	sense to mitigate your future risk. • Rates collected [from additional development] will of course rise substantially as these [new] houses are completed. More pressure will be placed on the infrastructure as the population grows. So the Council has a responsibility and must make plans for safe construction of coastal walkways and cycle ways around the entire area to support the community. • if this [policy] became live, with provisions for a 'do nothing' approach - would surely be reducing the cost of rates be accepted as that is a fair expectation for the owners in the area. If not then more proactive provisions for supporting the community are needed. More 'adaptive' than a lets 'do nothing' approach. • Section 3.1- It seems ironic that the policy acknowledges the coastal erosion issue as sea levels rise will in fact get worse and yet the basis of the policy is to reduce council responsibility. • The policy states "soft defences such as replanting and beach nourishment must be continued indefinitely" which is good. However, the same policy contradicts itself by stating in 3.2 the council has no legal obligation to protect its own land. Further more under section 3,2 could it not be agreed that legal precedent was set when the council did provide for some protection to private properties prior and therefor the policy is being written to mitigate future legal risk for themselves. • Can the public be assured (especially for example those affected by recent coastal slips) that the council will in fact commit to planting again in areas effected as it states? If so when as I was personally the same as a number of residents and yet we have not at the least had a door knock to cover a geotech or engineering review of land. • Just to note, this would have been better accepted than the morning fly by with the helicopter. • [Regarding proposed assessment on land owned by Council:] For most areas I am sure this reduces liability and responsibility for BOP Council. • The key thing here is to communicate in fact who owns the coastal areas in areas effected by erosion as I think most people don't in fact know who is responsible for it: So can you explain to me please and define what is council owned land. Selfishly in my personal case and a few along the Mc Donnell Rd area in Omokoroa we are not sure. • If you do in fact own the land at the end of our gardens you may want to (under your policy) get it inspected to decide on the Adaptive approach. • The community needs its council and needs leaders to step up and be proactive to show they will play there part appropriately to support recent events not write policies to hide behind. • [regarding proposed management options to mitigate erosion]: An adaptive view is agreed to be the only one of importance as it take into account a 100 year time frame. I find it bizarre … that some residents have all taken it upon themselves to provide protection for what I think is council owned land in the Omokoroa area. Putting in place tyre walls or wooden structures to try and mitigate risk and slow the issue with erosion vs a 'consistent' approach as per your policy objectives. • Accepting nature can't be controlled; economies of scale and budgets dictate that only a certain amount of money can be invested to resolve issues. However I wonder if members of the [Council] would share this same view had it of been there properties involved in recent slips. • Unless I am mistaken the "Civil Defence Emergency Act 2002" requires all levels of govt to work to reduce the risk. How does a 'do nothing' approach reduce risk and meet this legal requirement? • The Policy seems to be written to allow the [Council] grounds to fall back on in the event of future events, which it even acknowledges are imminent. • The policy needs more 'pro-active' provisions to give not more "certainty" as the objectives state but more "confidence" to local communities affected by coast erosion that in fact council leaders will investigate, communicate and take action accordingly to mitigate risk to the public as they best and as appropriately as they can, given available resources. • Does the policy allow for the [Council] members to do their best to serve the community or does it allow them to avoid some responsibility and accountability?
John Roper	15	Somewhat	• Supports precautionary approach to new subdivision design mitigating future erosion issues

		disagree	• Global warming is now accepted and should be accommodated. • For new developments section 4.1 is fine. However some of the options listed in 4.2 are not appropriate where development has already been undertaken in the past. • The do nothing option is only appropriate where no development is being affected in adjacent private ownership. In Section 3.2 it states that Council has no legal obligation to protect its own land or private property from erosion. Later Section 3.3 discusses where there may be a conflict between protection of private property values and the retention of the public asset. There is no conflict between public and private benefits and values in the case of maintaining the cliffs on the Omokoroa Walkway – both will benefit. • The adaptive approach allowing for the abandonment of 'strategic assets' will impact negatively on adjacent landowners. Adjacent landowners who have made investment decisions based on a history of maintenance of particular reserves should be entitled to notice with an acceptable long term time frame before any change to the maintenance of council land. • The adaptive approach as far as abandoning strategic assets is equivalent to Council having a fire on their property and taking no responsibility whatsoever to stop it spreading to yours. Should those adjacent landowners have any right to fight the fire/erosion on Council land to stop it further affecting theirs? Any right to do this, or a policy to work in a collaborative manner with Council, is not covered in this document. • The cause of the slippage on WBOPDC land is rainfall on the Omokoroa Peninsular not sea level rise. • The Policy Document relies heavily on the cost benefit analysis of various areas in the Opus Report "High Level Coastal Erosion Study". ["Omokoroa West, Omokoroa East and Omokoroa East Mid"] areas are ill defined making it difficult for the lay person to comment if the importance rankings mentioned are valid. These priority areas and rankings of importance need to be specifically outlined and mapped in the Coastal Policy document, not hidden away in a reference. • While Section 5 states that existing structures will be reviewed every 5 years with the first assessment in 2 years, the reality is that with the recent storm event March/April 2017, many of the existing structures / strategic assets eg parts of the Omokoroa Walkway, have been damaged and need repairing now to stop damage spreading further. Abandoning these strategic assets with no notice to adjacent owners affected is unacceptable. • The recent slippage has nothing whatsoever to do with sea level rise. It is the result of rainfall on WOPBC rated residential land. These two causes need to be differentiated in your Coastal Policy document, with perhaps different approaches for each. • a collaborative solution that would stop the slip continuing down the walkway, allow the continued usage of the beach adjacent to the public access at 26/27 Ruamoana Place and hopefully allow the walkway to be continued past these properties.
Philip Gall	16	Support	• Council must be selective [on its assessment approach on land owned by Council] e.g. consider important walkways • [Considers that the best option to mitigate erosion on land owned by Council is:] Selective Erosion Control • I wish to see Omokoroa Peninsular walkway protected. In turn in places this also protects residential property behind these walkways.
Karen Loten	17	Support in Part	• [The precautionary approach of ensuring any new subdivision and land development is designed to mitigate future erosion issues is] Essential, particularly now in Omokoroa. • perhaps now after very recent land slips, there needs to be an additional "immediate action plan" for just Omokoroa. • Identify empty sections fronting waterways that have not yet been built upon. Should they be built on? • [Regarding the proposed assessment approach on land owned by Council:] Agree, but if assessed that reserve land or esplanade strip cannot be protected or 'soft approach' then plans should be made now as to where and how the public amenity could be resited. • [Regarding management options to mitigate erosion on land owned by Council:] assess the value as to what should be protected and is a community asset e.g. walkways/children's playgrounds • Why were there no check as to whether no longer used septic tanks (as a result of mains sewage) were decommissioned. Over

			flowing tanks, Stormwater being released onto reserves appear to have contributed to recent land slips on Omokoroa. This is clearly visible from the sea when looking up at the slips.\
Sylvia Zlami and Peter Ehrlich	18	Somewhat Disagree	• [Supports principle of precautionary approach to new subdivision design mitigating future erosion issues] • It is unclear how the assessment approach will be managed in practice, how the evaluation criteria will be applied, whether there is a scheme for scoring the options against the evaluation criteria and/or any weighting to determine the relative importance of the individual criteria. • it would be useful to know whether population density, current and planned size of the community that utilises the assets in question, will be considered as part of the assessment. In the case of Omokoroa, where Council is permitting growth of 300% over the next few years, coastal features are widely acknowledged as a major draw card and extensively referenced in property sales material (e.g. "magnificent walks", "beautiful reserves and nature walks" from Victoria Keys development). Therefore, the potential abandonment of those assets would be of significant detriment to present and future residents, and developers. • It is worth noting that this tremendous growth also represents a substantial additional revenue stream for Council in perpetual rates income, along with one-off income (development fees and associated contributions). It would seem appropriate for this to be reflected as part of the assessment where erosion mitigation funds should be spent. • The policy doesn't make provision for coastal Council assets that are currently under construction and/or require additional construction stages for completion [e.g.] the Omokoroa Cycleway; the first stage which is currently being constructed reveals an extremely low-lying coastal asset. It is unclear if future stages of this (estimated) $11M project are likely to be abandoned under the proposed 100- year view of the policy. • a. It is unclear how to interpret the "inherent threat to life and property". Does this include threat to private property? • b. It is stated that "each option" (i.e. maintenance, replacement, relocation or abandonment of assets) will be assessed against the willingness of the community "to pay for the costs of maintaining the shoreline in a fixed position indefinitely". It is unclear if the maintenance of the shoreline is in relation to the specific asset in question. • c. it is unclear what the intention of the last criterion is, or how it will be applied ("When property owners decide to relocate their own buildings…"). • The policy refers to "council reserves and strips" in context of Council as landowner. It is assumed that "strips" refers to "esplanade strips" as referenced in the definitions section of the document. • the policy does not seem to make a distinction between esplanade strips and esplanade reserves • abandoning strategic assets as part of the adaptive approach has the potential to pose a severe threat to ratepayer funded strategic assets. • [Where] Council is not obliged to protect private property… landowners may adopt [any] methodology to … stabilise land. This raises difficulties in compliance, collaboration and consenting. • Property loss due to Council's refusal to maintain its land would likely expose Council to the risk of litigation with ultimately potentially costly repercussions for rate payers. • We support do nothing and adaptive erosion for undeveloped coastal land. We do not support it where it threatens damage to public or private property/buildings or results in the loss of important public amenities. Additionally, a focus towards implementing soft solutions is encouraged. • the draft policy engenders a great deal of uncertainty and doubt as to what we may, or may not, expect from the Council in its role as landowner, given that Council shirks any obligation to protect its own land. • [please] explain how the application of these criteria would affect Omokoroa. • it would be reasonable to expect that Council has already formed a view about its coastal assets [in Omokoroa], especially in light of the very high prioritisation the locality received in the Opus report ("Tauranga Inner Harbour High Level Coastal Erosion Study August 2015"). • we seek certainty how the popular Omokoroa clifftop walkway would be assessed under this policy and in consideration of

			Council's previous erosion protection investment in a seawall below the walkway along with installation of horizontal drainage on a small western section (which notably performed as designed during this extreme weather event). • suggest that an additional and practical focus on soft options be adopted, including the planting of Vetiver grass (or similar) for cliff stabilisation on the peninsula, as has been proposed in an earlier report ("Omokoroa Escarpment Stabilisation, 2011). • It is unclear what "taking at least a minimum 100 year view" will entail. The modelling "of a minimum 1-metre sea level rise" does not take into account the accepted range of predictions [which is defined as] a statement of an uncertain event. • making long-range predictions of sea levels is heinously tricky and an inexact science at best; [so] a 100-year view with the premise of a minimum 1-metre sea level rise might be employed to unduly justify the abandonment of a vast number of coastal assets • a cautious approach is desirable for strategic/infrastructure assets, [but] recreational coastal assets warrant more latitude in approach. • imprudent to assess exclusively against the maximum likely sea level rise, when a more benign scenario cannot be excluded.
Joint Submission (32 submitters)	19	Somewhat Disagree	• The proposed approach seems a sensible solution and is supported in principle. • There is no indication how the assessment criteria [on land owned by Council] may be applied in practice. • opposes the policy permitting Council to abandon its assets including strategic assets. • it is unclear what the relative weighting of [amenity] criterion is and/or to what extent it can influence outcomes. • It is unclear whether the assessment will consider population density and/or the impact of unprecedented growth • erosion mitigation protection may be desired/required in more localities than the budget can accommodate. • The 'do nothing' approach is sensible where property is not endangered. • Holding the line should be the preferred choice, especially for strategic / premium community amenities • the primary objective of the policy, namely "to provide certainty to the community" about how Council will meet its obligations as a landowner regarding erosion mitigation, is not being met. • It would be very helpful if Council would indicate how the policy would be implemented in our specific situation [Omokoroa clifftop walkway] • The future of the clifftop walkway, along with Council's other Omokoroa coastal assets, will determine our support of this policy. • Omokoroa's coastal environment features, and the amenity they provide, are the very reason why we chose to live where we live!
Waterview residents group	20	Support in part	• We support the Policy objectives in Section 2 • The Policy does not cover the coastal erosion issues from a geological perspective, dealing with ground water run-off and seepage causing land slips • [Concur with] reference to 3.1 Physical Environment • Clause 3.1 does not appear to be facilitating the land slip erosion such as those that have and continue to occur around the inner harbour where ground water has caused erosion from top of unstable cliff faces. • we do not agree that council have no legal obligation to protect its own land or private property from erosion. • the Local Government Act 2002 states: • Under the Local Government Act 2002 under section 11(a) (which was amended in 2010) Council is tasked with providing core services including the avoidance or mitigation of natural hazards in 11 (a) (d) • 3.3 Community values could read that any public intervention to protect private property on the inner harbour or coast, where there are issues with coastal erosion, the council would be prepared to work alongside the property owners in resolving issues. existing Council owned land, parks, reserves and walkway strips should be kept opened and maintained, and when problems arise, Council, in league with the residents, should work on negotiating mitigation of the problems. • it might be sensible if Council could adopt a precautionary approach to any proposed future parks, reserves and walkways, cycle ways etc.

			• section 4 appears to deal only with coastal sea erosion from the bottom, and completely omits the issue of ground water seepage from the upper regions of cliff faces such as the recent events in Omokoroa. • [there needs to be a] plan put in place of good practice for management [for Rainfall Events] over the next 100 years. • [Support] "Holding the line" • [the draft management policy] omits to include ground water issues causing cliff erosions above sea level, as we believe has proved to be self-evident and a significant cause resulting in the recent Cyclone Cook massive coastal slips around the coast of Omokoroa.
Michael and Marion	21	Support in Part	• A good approach given the predicted future effects of global warming. • 'Do nothing' is appropriate only where no development currently exists. • The 'adaptive approach' applied to existing areas of development will have a negative impact on all effected property owners. • adjoining property owners [of walkways] have based investment decisions on the assumption that council would protect their own asset for the future. Those property owners should be entitled to a long term period of notice, with an agreed time frame before any changes the maintenance of council land occurs.
Tim Lander	22	Somewhat Disagree	• I believe the proposed policy is not sufficiently comprehensive • The policy states 'avoidance' of hard engineering protection works for any development (4.1). This includes an enormous range of activities, to me basically meaning 'everything' (including maintaining an existing strategic asset such as public walkway, and all other infrastructure' private development etc.) • The policy and stated approach I believe could be applied poorly, particularly to the Omokoroa Peninsula land erosion situation • The policy lacks cognisance of the significant geological and groundwater factors attributable to erosion. inner harbour tidal effects [are] not the sole factor in play • Addressing the geological and groundwater over-saturation issues at Omokoroa should not become restricted by limitations of this policy eg. 'hard' or 'soft' engineering preferences • Somewhat disagree [on proposed assessment approach on Council owned land] • The 'General Approach' aspects I believe cannot be restricted solely to 'Council owned land' • How would [the] precautionary approach [be applied] for situations where public infrastructure crosses private land and vulnerable to damage by erosion on Council land? • Somewhat disagree [on options to mitigate erosion on land owned by Council] • The 3 [options to mitigate erosion on land owned by Council] are insufficient to address the Omokoroa erosion situation (ie. the influence of groundwater on land subsidence, distinct from inner-harbour wave action or sea-level rise). • The distinction of Reserve land as 'undeveloped' (4.2 Do Nothing approach) precludes how these same areas of Reserve land function as protection buffers in themselves. • A simple 'do nothing' approach is unacceptable. • Public infrastructure contributes enormously to the fabric of urban areas; as a desirable place to both live, grow and visit, all the forms of infrastructure from walkway access to sewer pipes need to be treated as strategic assets of high value • The proposed policy preamble on Community Values sets a contextual flavour of 'individualised benefit' vs wider values. This background poorly represents all of the Western Bay communities' concern and commitment to where we live • the proposed policy is not comprehensive enough or satisfactory to fall back on for managing the effects of inner-harbour erosion, coupled with Community values and aspirations (particularly at Omokoroa)
Lorna Bryson	23	Somewhat disagree	• Erosion has been known about for many years and council has still spent money on subdivisions and infrastructure in the at risk areas, too late now to get cold feet. • In Omokoroa I disagree ['with the proposed assessment approach on land owned by Council] as the walkway and esplanade are significant attractions of the area • Hold the line

Chris Hector	24	Support	• This document does nothing to provide certainty. • 'hold the line' being least favoured is sensible in rural areas, but not development areas like Omokoroa with increasing number of residents, and the waterfront being an important amenity • Coastal walkways on Council land are a feature of the district, and are important for health and recreation. • Suggest adopting a zoning approach to the options, so that residents have some sense of which lengths of coast are most likely to be abandoned to natural forces etc • maintaining attractive coastal walkways and facilities should be a priority for Council, unless erosion and slippage are so serious as to make this impractical.

Shane Adams	25	Somewhat disagree	• As an Urban Growth node, Omokoroa should receive proper investment to allow the infrastructure in the peninsula to reflect the needs of the local population.
			• slips at Omokoroa are the worst and are the closest to high density housing.
			• sea level rise is too great an issue to consult on meaningfully. current focus should be on more tangible and immediate issues such as existing coastal erosion trends.
			• slips at Omokoroa that are … massive eyesore and potentially dangerous [and] a very bad look for a proposed urban growth area. rockwalling is a visually attractive compromise between the costs of stabilising the cliffs and the need to keep a shoreline that is protected from further erosion.
			• my suggestion is that the rockwall concept be extended considerably, as follows:
			  ○ build a rock-based walkway (ie promenade, 3-4 m wide) right around the tip of the peninsula (approx from Waterview Terrace to the Domain). Build in stages over a 10 year timeframe.
			  ○ The walkway could eventually … allow a complete circuit of the peninsula for pedestrians … and also avoid the issue of having to maintain the clifftop path in those places where erosion will inevitably prevent access at some future point.
			  ○ Where the walkway is below an erosion-prone cliff, it should be built some 5-10m on the seaward side of the high tide mark, with culverts to allow the tide through, [keeping] the walkway clear of any future debris from slips
			  ○ The cost should be met by the region-wide rating base because of the Smart Growth plan for Omokoroa. Sections of the walkway might be sponsored by local businesses etc to assist in funding.

Jenny Sutherland	26	N/A	[wishes to attend the meeting for residents bordering the walkway on 10th May]
Alan and Linda Fisher	27	Somewhat Disagree	• Supports precautionary approach on subdivisions • Agrees with proposed assessment approach • 'doing nothing' is not very assuring • Holding the line would be the best solution from our perspective. • Council Could be more proactive
Beverley Teeboon	28	Support in part	*<no comments>*
Tammy Bruce	29	Somewhat Support	• Supports precautionary approach • [proposed assessment approach on Council owned land] is a good approach and necessary on a case by case basis. • [Management options to mitigate erosion on land owned by Council]is a good approach – potentially. • if the "do nothing" option is likely to be adopted – I would hope for public opinion so it's not used as a cop out to not maintain reserves, strips, public walkways etc.

Liz Farrell	30	Support in part	• If an area is a known risk area: slip/flooding etc it should not be approved for building etc. It is financially and socially irresponsible. • All areas should be assessed on a case by case basis and consultation would be required for each proposal to enable local residents to 'have their say' • Most people will disagree with a 'do nothing' approach but for too long we've allowed people to build ridiculously and nature will always win! • Communication and consultation is important
Peter Good	31	Support in part	• Fully support and agree [with precautionary approach] • Agree [with proposed assessment approach] • The 'adaptive' approach is rather vague. How much investment is the Council prepared to make in any given situation • Council [should] consider actively encouraging [its] land owners adjacent to reserve strips to undertake planting on the reserve and give advice on any other measures they could take. This would surely be cost effective as most land owners would be prepares to incest time and money in protecting their major asset.
Margaret Good	32	Support in part	• Definitely agree with [precautionary approach] • Agree with [proposed assessment approach] • Adaptive erosion is the obvious approach to take. • Would have appreciated advice from Council as to measures we should/could be taking to preserve out property and the likelihood of being able to remain on it • We are investigating planting and drainage we can do on our property – maybe Council could encourage others with some useful positive information
Lea Tuerlings	33		• Suggest managing land use with restricted, permitted soil use only • Suspects the water table level has risen substantially over the past, which in turn cause soil swelling • Soil erosion and repair needs to be a priority • Suggest focus on soil itself, e.g. worms and other soil microbes which bond the soil, Biochar which stores copios amounts of water and could be a possible addition to alleviate swelling, fungi (to rehabilitating soils), establishment of deep rooted plants, windbreaks, permanent and Tree Crops, Terracing Forestry, Diverting, Infiltrating and Spreading Water Flow i.e zero run off • need to consider introducing methods to create [Air, Space, Structure and Organic Matter] conditions at each layer of the soil, right down to where the problems seem to be at its worst. • [clay-like soil] gets saturated very quickly, … holding extreme amounts of water with … nowhere to go but overland causing more erosion as well as aerobic conditions throughout. • Water table in Omokoroa has risen substantially • Suggest conditioning the soil from above, through the use of Chisel Plough type systems, to create environments for compost worms to recreate the soil • Types of plants that could be used to aerate the soil and add nutrients are radish, as well as Tree or Shrub legumes which would put more organic matter in place through leaf fall. • if lower ash layers are aerated but lacking in organic matter and structure and the top layer is over saturated lacking in air and space, it seems logical to rehabilitate both layers to re-create the strong structure needed. • Suggest building soil structure at the source; intervene with the right strategy at each layer • some form of deep underground worm farm system to introduce the organic matter • Suggest setting up an education programme to help the community understand the importance of feeding and creating sound soil from the top down. Also work in Play Ground Design project as part of this. • Please remember that all these notes and ideas are from a very beginner, purely interest and observation knowledge base.