

Oral Submission from Tauranga Branch Forest & Bird

RC14513L - Glen Isla Place Rock Wall

Thank you for taking the time to consider the written submission of the Tauranga Branch of Forest & Bird. Unfortunately I am not able to present an oral submission today due to sickness.

The Tauranga Branch of Forest & Bird participates in regional and local RMA processes on behalf of our local members and supporters including those in Waihi and Waihi Beach.

Forest & Bird opposes the granting of RC14513L for a rock wall on the following basis:

- 1) Public land should not be used for a hard structure to protect private property.**
- 2) Hard structures and their adverse effects should be avoided:**

Hard structures in the coastal environment should be avoided as they have been shown to undermine dune functioning and exacerbate the loss of beach over time. This will have an impact on both public access, public enjoyment of the beach and on wildlife.

Repeated evidence in New Zealand and overseas has found that hard structures displace and increase erosion effects elsewhere, particularly neighbouring properties. The neighbouring property, Island View Esplanade Reserve, has high biodiversity values. It has largely intact and unmodified native dune vegetation which is significant given its scarcity, and while a survey has not been done of native fauna it is likely that shore skink are present at least.

The site where it is proposed to construct the structure is of critical importance to the Tūturiwhatu dotterel, as it is one of only two breeding and juvenile feeding areas in Waihi Beach. Construction of this structure will have a significant negative impact on this threatened species and once constructed is highly likely to result in exacerbated erosion of the beach in front of it which would destroy this important dotterel feeding area.

3) Use of a hard structure rock wall is inconsistent with national, regional and district policy:

The NZCPS, Regional Coastal Environment Plan, Regional Policy Statement and the WBOPDC Coastal Erosion Response Policy 2017 do not support the use of hard structures in the coastal environment to protect private property.

4) Cumulative effect and precedent value:

The NZCPS Policy 3(2)) requires decisions to be holistic and with a view to the future. While this is a single example, it could set a precedent for the use of hard structures for wider Waihi Beach and make it more difficult for the council to take a different approach elsewhere.

There is no assessment of what our coastlines will look like if this proposed action was replicated throughout the Waihi Beach and the wider Western Bay of Plenty and what the environmental, financial and amenity impact of that would be on the wider community.

5) Lack of proper consideration given to alternatives:

The application does not give proper consideration to soft protection alternative approaches – these are approaches that have been used for many years that utilise natural habitats and processes to increase resilience for both nature and people. Restoring the dunes will enhance their coastal erosion defence abilities.

For the reasons outlined we submit that this consent should be declined.

Kate Graeme
Tauranga Branch, Royal Forest and Bird Protection Society