

Additional Evidence – Objection to Proposed Waihi Beach Coastal Protection Structure (RC14513)

Submitted by Dotwatch Waihi Beach and Surrounds

It has come to our attention that **since the original submission date, extensive works have been undertaken at No. 12 Glen Isla Place**. To be accurate this was noted on 02 June 2025. These works have resulted in the **destruction of the protective dune** to create direct resident access to the beach, with all protective dune vegetation eradicated in the process.

This action is in **direct disregard for the integrity of the dune system**, which serves as a vital buffer between the property and easterly swells. It also contradicts the stated environmental purposes of the Glen Isla Protection Society Incorporated (GIPS).

We refer the Commissioners to **Submission Point One** from our original submission, as outlined below:

Glen Isla Protection Society Incorporated (GIPS)

GIPS was incorporated on 20 December 2023, with the stated purpose of protecting and enhancing the natural coastal environment in the vicinity of Glen Isla Place, Three Mile Creek, and Island View Reserve, Waihi Beach. Membership is exclusive to seaward properties and does not represent the broader Glen Isla Place community, most of whom oppose this resource consent application.

The Society's stated purposes (Appendix C, Section 4) include:

- Protect and enhance the natural and coastal environment.
- Design, obtain approvals for, and construct coastal protection measures.
- Manage and, if necessary, own such protection measures.
- Undertake any other actions necessary to achieve the above purposes.

Since incorporation, there has been **no evidence of remedial work, replanting, or collaboration with Coast Care** to restore the dunes. Nor have any measures been taken to prevent the dumping of garden waste onto the dune system. A functional dune ecosystem requires seaward dunes to be dominated by native sand-binding plants such as spinifex and pīngao — knowledge that has been well-established for decades. There has been **no effective effort by GIPS property owners** to support the development of a healthy dune system on their properties or the adjoining public foreshore.

The recent works at No. 12 Glen Isla Place **constitute a clear breach of dune protection principles** and are inconsistent with the Society's stated objectives. Instead of protecting and enhancing the coastal environment, these actions have **removed protective vegetation, destabilised the dune, and prioritised private convenience over environmental integrity.**

Given this **critical evidence of neglect, environmental damage, and unauthorised modification**, we question why any further consideration should be given to this resource consent application. The recent actions raise **serious concerns about the applicants' ability or willingness to meet the environmental obligations that underpin such approvals.**

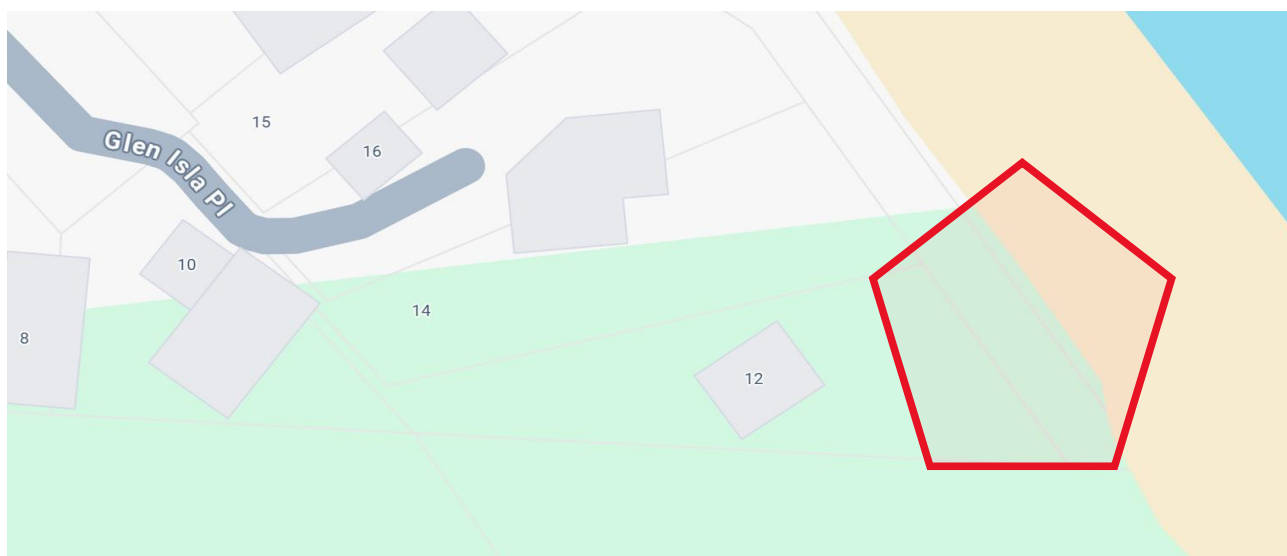
If the applicants, or members of the Glen Isla Protection Society Incorporated, have already engaged in works that have **knowingly damaged a protected dune system**, removed established vegetation, and created unconsented private accessways to the beach, it is reasonable to conclude that:

- **Future compliance is highly questionable** - There is no assurance that any conditions imposed under a granted consent would be respected or maintained.
- **The pattern of behaviour suggests disregard for regulatory processes** - Acting without consent undermines both the integrity of the coastal management framework and the trust between private landowners, the community, and the consent authority.
- **Environmental stewardship is demonstrably lacking** - The removal of native sand-binding plants and the failure to engage with established restoration partners (e.g., Coast Care) contradicts the stated purpose of protecting and enhancing the coastal environment.
- **Risk of precedent** - Approving this application despite clear breaches may set a precedent that encourages other property owners to disregard dune protection rules, accelerating the degradation of Waihi Beach's coastal resilience.

In light of these actions, we submit that the applicants have **already demonstrated a willingness to prioritise private convenience over environmental integrity**, even before consent has been granted. This should be a critical factor in the Commissioners' decision-making, as any approval under

these circumstances' risks legitimising past damage and enabling further non-compliance. We would welcome the Commissioners to view this for themselves.

Map outlining area of concern – No. 12 Glen Isla Place



2 x Photos submitted of dune system in original submission and prior to unauthorised works being undertaken





Current situation - critical evidence of neglect, environmental damage, and unauthorised modification of dune frontage No. 12 Glen Isla

