



**National Council of
Women of New Zealand**

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Wahine O Aotearoa

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**Submission to the Department of Conservation on the
NZ Coastal Policy Statement and Inquiry**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 46 Nationally Organised Societies and National Members. It has 28 branches throughout the country attended by representatives of those societies and some 150 other societies. The Council's functions are to serve women, the family and the community at local, national and international levels through research, study, discussion and action.

Introduction

NCWNZ has had an interest in the subject of NZ Coastal Policy and Marine areas since 1990. NCWNZ has a long history of submissions supporting marine protected areas, with resolutions dating back to 1927, and supporting the seabed and foreshore remaining in its natural state.

Thank you for the opportunity to comment on the Proposed New Zealand Coastal Policy Statement 2008.

The objectives of the Policy were in the main supported by members of NCWNZ, as being consistent with the RMA, with comments as follows:

“Objective 1

People and communities are able to provide for their social, economic, and cultural wellbeing through the use, development, and protection of natural and physical resources in the coastal environment.”

Members would not want to see development sited inappropriately, such as on sand spits or dunes, or close to wildlife habitat. It was suggested that the wording be stronger: “to recognise the rights future generations have to enjoy the natural ambience”.

“Objective 2

Subdivision, use, and development in the coastal environment are managed to ensure they occur in places, in forms and within limits consistent with sustainable management.”

Subdivision, use and development should only take place after a national protocol protects in perpetuity features and landscapes that should never be developed. It was thought that there should be more emphasis on infrastructure, for example all coastal development must have complete sewage treatment and sustainable water supply.

“Objective 3

The natural character of the coastal environment is preserved, through the protection or restoration of natural landscapes, features, processes and indigenous biological diversity.”

Members considered that Objective 3 should be fulfilled before Objective 2 is considered. High density coastal housing was not considered desirable. Often, too little existing character is retained as the value of coastal property spirals, and the kiwi bach character of a coastal village is replaced by a “mansions by the sea” character. For instance, the high value development of the Tasman coastline was criticized.

DOC is promoting public participation in restoration projects, which is applauded.



**“Objective 4**

Management of natural and physical resources in the coastal environment takes account of the principles of the Treaty of Waitangi and recognises the role of tangata whenua as kaitiaki.”

Some areas are of special significance to Maori, and NCWNZ supports respect to all people who dwell here.

“Objective 8

Coastal hazard risks are managed increasingly by locating or relocating development away from risk areas, protecting or restoring natural defences and discouraging recourse to hard protection structures.”

This ties in with objective 3 – protection must come first, development very much second, not the reverse. Climate Change will increase the risk of sea level rise. Hard protection structures are undesirable. In areas where these have been erected, such as Waihi Beach, the sea tunnels underneath and eventually destroys them, unless they are built and reinforced on rock. There is no possible protection from sea level rise.

“Objective 10

Management of the coastal environment recognises the Crown’s interests as an owner of land in the coastal marine area, and New Zealand’s international obligations.”

- *Objectives can be read either to promote development or protection, strong language is needed to make protection the priority.*
- *It was thought that the objectives were like motherhood and apple pie, with no substance to them, no mention of climate change. Is it always practical to try and save coastlines against the forces of nature?*

Of the 57 policies listed in the document, one that impacts significantly on the proposed objectives is as follows.

“Policy 5 Precautionary approach

“A precautionary approach shall be adopted towards proposed activities whose effects on the coastal environment are uncertain, unknown or little understood, but whose effects are potentially significantly adverse to that environment.”

Policy 5 is strongly supported by NCWNZ.

Some members thought that this clause needed legislation to enforce it – the economic push to develop is too strong and the lure of cash return for sub-dividing farmland too prevalent. A change to rating systems is needed since the current system pushes rates so high that the farmer is foolish not to develop and walk away.

There has been much talk of global warming and the effect the melting of Antarctica may have on New Zealand and coastal areas with the rise of sea level. This will need a precautionary approach in regard to development.

“Policy 8 Areas proposed for statutory protection

If an application for a resource consent affects an area of the coastal environment for which a proposal for statutory protection has been publicly notified, the purpose of the proposal and the effects of the proposed activity on it shall be given due regard in the determination of the application.”

The protection for statutory protection must take precedence over any proposal for an activity unless that activity is a protection activity.

**“Subdivision, Use and development:****Policies 14, 15 and 16**

These policies “encourage a mixture of land uses, and discourage continuous urban development of the coast, where it has not already occurred... avoid urban sprawl ... encourage mixed commercial and residential development and a variety of housing types and densities.”

There must be continuity between local, regional and national government policies. It was considered that there should be legislation to prevent unsuitable urban sprawl.

There is agreement for these policies only where it is feasible. There are coastal hazards, houses falling into the sea and coasts slipping away. In Tangoio, action had to be taken to remove existing dwellings – an expensive remedy.

Habitats need to be provided for to ensure diversity and resilience in species and ecosystems. This often requires areas of no development or intrusion.

However, Peak Oil could impact on the current commuting ethos and a positive spin off could be less pressure to develop coastal areas.

“Policy 20 Surf Breaks of national significance

This identifies four national surfing breaks of national significance which will be protected from inappropriate use and development.”

Comments to Question 4 on Policy 20:

There are six well known surfing breaks of national significance. Housing development would not be appropriate for these areas.

“Policy 35 Restoration of natural character

“It is a national priority to restore the natural character of the coastal environment, in appropriate circumstances, including by:

“(f) restoring dunes and other natural coastal features or processes;”

NCWNZ suggests that the clause read:

(f) restoring dunes, saline wetlands, inter-tidal salt marshes, and other natural coastal features or processes;

Wetlands are a vital ecosystem for storm protection, as New Orleans found when hit by Hurricane Katrina. Inter-tidal salt marshes are very important for maintaining biodiversity, and are particularly vulnerable to development. Royal Taupo swamp near Plimmerton was considered a good example.

Mangroves provide habitat for many fish and some birds, as well as storm protection. However, they can also spread to an alarming extent with increasing nutrient and sediment loads coming down waterways. Some biodiversity has been lost where mangroves have taken over. NCWNZ suggests that they should be restored where they have disappeared, and controlled where the spread is too much. Fertiliser run off may have to be reduced or eliminated.

“Policies 30 – 36 To preserve the natural character of the coastal environment... indigenous biological diversity...outstanding natural features and landscapes... assessment and protection of natural character”

These policies were considered the most important of those listed. NCWNZ considers that protection should be listed before development.

**“Policy 38 and schedule 4 – Maui Dolphin”**

The requirement to include the map of Maui Dolphin habitat in regional coastal plans has advantages with regard to integrating resource management and other actions required under the “Draft Hector’s and Maui Dolphin Threat Management Plan (2007)”. There is no guidance, however, about the scale of activities that are relevant to Maui and Hector’s Dolphins. Hector’s dolphin (the name of the same dolphin in a different area) should be included.

“Policy 39: Walking access as a national priority:”

The RMA includes public access to and along the coastal marine area as a matter of national importance – this policy now includes specific provision for “walking access as a national priority” - which is an improvement. Private property ownership to high tide level should be precluded in some circumstances to allow pedestrian coastal access above high tide.

One response disagreed strongly with a mixed residential and industrial zone. However, when approving housing development, provision should be made for adjoining industrial and commercial zones to allow the opportunity for people to work in their neighbourhood to avoid travel costs. Areas with apartments and cafes, strategically placed shopping areas, dentists and doctors rooms, could be included.

“Policy 42: Vehicle access”

This Policy requires that Council Plans identify where the use of vehicles on the foreshore and seabed and on adjacent public land is and is not appropriate. It is hoped that this will enable Councils to limit the increasing use of vehicles on beaches with environmental damage to dunes, as well as flora and fauna. It was thought that there might need to be changes in legislation to support this policy.

“Policy 55 – 57: Historic heritage”

This is an improved policy compared to the 1994 NZCPS, since it recognises historic heritage as a new status within Section 6 of the RMA.

Conclusion

This Statement of Coastal Policy was welcomed by NCWNZ, since many coastal areas have been totally devastated in the past, and an early start to the Policy would be encouraging.

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National President

Sara Dickon
Convener, Environment Standing Committee