

Attachment to Coastal Plan submission Ian Holyoake

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Attachment to Proposed Waikato Regional Coastal Plan

Further part of Submission by Ian Holyoake

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The submission form had insufficient space for my written content and I could not work out a way to copy new cells. This is the remainder of my submission.

The RMA requires there to be a NZCPS at all times. The 2010 NZCPS is the current NZCPS that is to guide councils in their day-to-day management of the coastal environment.

Statement NZCPS:

New Zealand coastal policy statement

The New Zealand Coastal Policy Statement 2010 (NZCPS) guides councils in their day-to-day **management** of the coastal environment. The NZCPS is the only compulsory NPS under the RMA. The RMA requires there to be a NZCPS at all times.

The Proposed Waikato Regional Coastal Plan is to become councils day-to-day management of our coast. It must reflect the guidance within 2010 NZCPS.

Day-today management involves the executing of the plan and continuously making adjustments to meet desired outcomes.

I agree with the Chairs foreword. These are the outcomes I would like to see by the implementation of a plan. I have highlighted in yellow what resonates with me.

Chair's foreword

Getting it right for our coasts

Spending time on our seas or at the beach is a favourite Kiwi pastime. It's a place where we gather with whānau and friends. Where we go to maintain our physical, spiritual and mental health. And it's also where we can go to gather food.

*It's not surprising then, iwi, stakeholders and communities share the desire to **protect and enhance** these qualities so they can **continue to be enjoyed for generations to come.***

*That's where the Waikato Regional Coastal Plan has the really important job of setting out how we **sustainably manage** our region's coastal environment.*

*Input from iwi, stakeholders and communities have had a big influence on how we've developed the proposed plan as a tool that will help us to **strike a balance between protecting our environment and using its resources**.*

*In this new plan we have taken a fresh look at whether activities in the coastal marine area have the **right level of scrutiny** for the outcomes we seek and have made the plan easier to understand and use in decision-making.*

What I see is a 'plan' but what I do not see is how the plan is to be managed. To implement the proposed plan, there needs to be management layers including measuring and monitoring, controlling, correcting and reviewing, kpi and feedback to measure to improve the success of the plan.

The Proposed plan claims there is 1200km of coastline within the ward. This is way too much for me to focus on. My focus is on the approximate 4km of coastline around Whangamata. I trust other people will be focusing on their backyards. That way when we feel the urge, we can visit other areas and enjoy the beauty of nature as the chair intends.

My Background and reason for my submission:

I am currently engaged as a volunteer ratepayers stakeholder on TCDC Stormwater Group to create a Stormwater Master Plan for Whangamata. I am semi-retired businessperson acting primarily in the building industry dealing with compliance matters B1, B2, E1, E2 and H1. I have some familiarity with these regulations. In this instance E1 is the main regulation.

Stormwater occupies a significant section within the plan. This is good. It seems like a plan is near.

On the dark side my studies to date regarding stormwater and addressing 'natural hazards' appears to be little more than 'lip service'. As long as it appears to comply with RMA and the Building Acts 1991 and 2004 they get away with it and councils don't seem to care. In relation to stormwater maintenance is even worse. TCDC does not even have a completed certificate to operate a stormwater network.

Stormwater:

In the end rainwater of any form will gravitate to our CMA by way of rivers, streams, estuaries, overland flow paths or through aquifers. In heavy rains water to water can become uncontrolled when overland flow paths are full. This has occurred through millennia. Pre-settlement humans had no influence. In an odd way the evolving environment is what attracted us to this part of the world. Our forebears liked what they saw so stayed. Since settlement whatever race or creed, we are yet to pay the price of our subsequent

expediency. Generations have passed the soils of expediency down to us. This plan is our way to put things right as best we can.

It would be good if we could adopt the Chairs forewords word for word. I highlighted above what resonates with me in yellow. I hope it's not just me, or the people/staff who wrote this plan, or the people taking time to submit ideas, or those whose job it is to filter the submissions, but to those who frankly 'don't give a dam' about our environment and how to look after it.

My concerns, with respect to stormwater, relates to the Holocene sands beneath Whangamata. We built on and are now living on the sediment of the Wentworth and Otahu Rivers deposited into the deltas, the breakup of basalts into fine granules over the past 10,000 years.

NIWA, Environment Waikato, University of Waikato, river, and coastal scientists all accept that post-settlement sediment levels have increased exponentially. Depending on which study you prefer it is claimed by those who are experts in this field that forestry is by far the biggest creator of sediment (approximately 42%-48%), farming (20%-23%), followed by native forests which humans selectively felled the canopy, and a few other causes.

These industries are supporting our economy. Export earnings, employment, balance of payments, cash. This means any adverse effect caused by these industries will be made good out of the same purse. The plan fails to address this.

Sedimentation:

Positive Effects:

The positive effect of sedimentation is in the right quantities it has provided fertile pasture land, restores and rebuilds sand dune and beaches, and elevates land for settlement.

Adverse Effects:

Sedimentation effects is by the chain type reaction of erosion, without management:

1. Sedimentation erodes into waterways.
2. This raises the river and stream beds
3. This raises water tables
4. This causes more flooding as water has less controls with less channel depth and narrower flow paths.
5. This creates more deposits along riverbeds and onto fertile lands.
6. Which starts the vegetation cycle
7. Vegetation establishment follows the aggressor plant species. These can be native or foreign, mostly migration/spread
8. Vegetation life cycles leads to organic build up
9. Organic matter changes the ecosystem from fish/aquatic based to plant/animal/bird based.
10. Organic, animal and bird wastes pollute lower downstream waterways and into CMA especially in first flush

11. Higher riverbeds alters aquifer release with resultant increase in water table levels
12. Higher water tables reduces the capacity of the Holocene sands to absorb the same amount of rainwater
13. Meaning over time, as the sedimentation lifts water tables, the aquifer breaks the surface of low lying ground, and depressions.
14. This overwhelms existing stormwater infrastructure as it was not designed accordingly.
15. Discharge pipes become buried in water so cannot flow to design capacity
16. Sedimentation deposits continue down waterways and raise the sea beds in estuaries and harbours
17. This raises the water tables within the properties and infrastructures bordering estuaries and harbours
18. This again effects the aquifer ability to release water into waterways
19. Which restricts the drain off rates during storms and delays surface water drain off on low lying properties that get flooded.
20. The vegetation becomes prolific at the river water level and tidal change level where plants can get oxygen 24/7.
21. Vegetation becomes more dense and established forming even better silt traps which catch even more sediments during floods.
22. Some of the worst silt trappers are Toi Toi, Toe Toe or pampas grass, Manuka, Mangroves, Gorse, blackberries, brackens, lupins, flaxes – pretty much anything of seed origin transported by birds and wildlife.
23. These compete amongst each other so become overly dense so trap more silt, die, compost and degrades into more organic material.
24. Almost all of these are identifiable as they have become prolific in Moanau Anu Anu, Harbour and encroaching up the Otahu and Wentworth rivers.
25. Mangroves have been singled out politically to be protected.
26. None of these invaders were present when early photography was available.
27. Now they have become established because people have worked hard to protect them.
28. But these protection efforts are a misunderstanding of the critical ecosystem that nature gifted us over the past 10,000 years.
29. Whilst this political battle was waged native sea grass has all but disappeared.
30. Sea grass is important as it provides shelter and food for particular marine invertebrates and fishes, and foraging grounds for certain shorebirds. Sea grass can stabilise the seabeds and reduce erosion. It improves water clarity.
31. I have read perhaps 8 Environment Waikato reviews of sedimentation in Whangamata. These are claimed to be ‘monitoring’ reviews.
32. What these reports have monitored is that our waterways have been destroyed because the monitoring failed to lead into management of the adverse effects.
33. This is because the strategic plan failed to include how to manage and prevent adverse effects and what actions were required to reverse the known effects since settlement.

34. The problem I have with the plan is it becomes a pointless exercise without clear action statements how the adverse effects can be mitigated, prevent recurrence and reversed.

The Whangamata Holocene sands are bordered along the North and East by Wentworth River, Moanu Anu Anu and the Harbour and along the South and West by Otahu River and its estuary and to the West the short elevation of hills between Otahu and Wentworth rivers which has live spring water well above the water table. This leaves the Ocean to drain the water table.

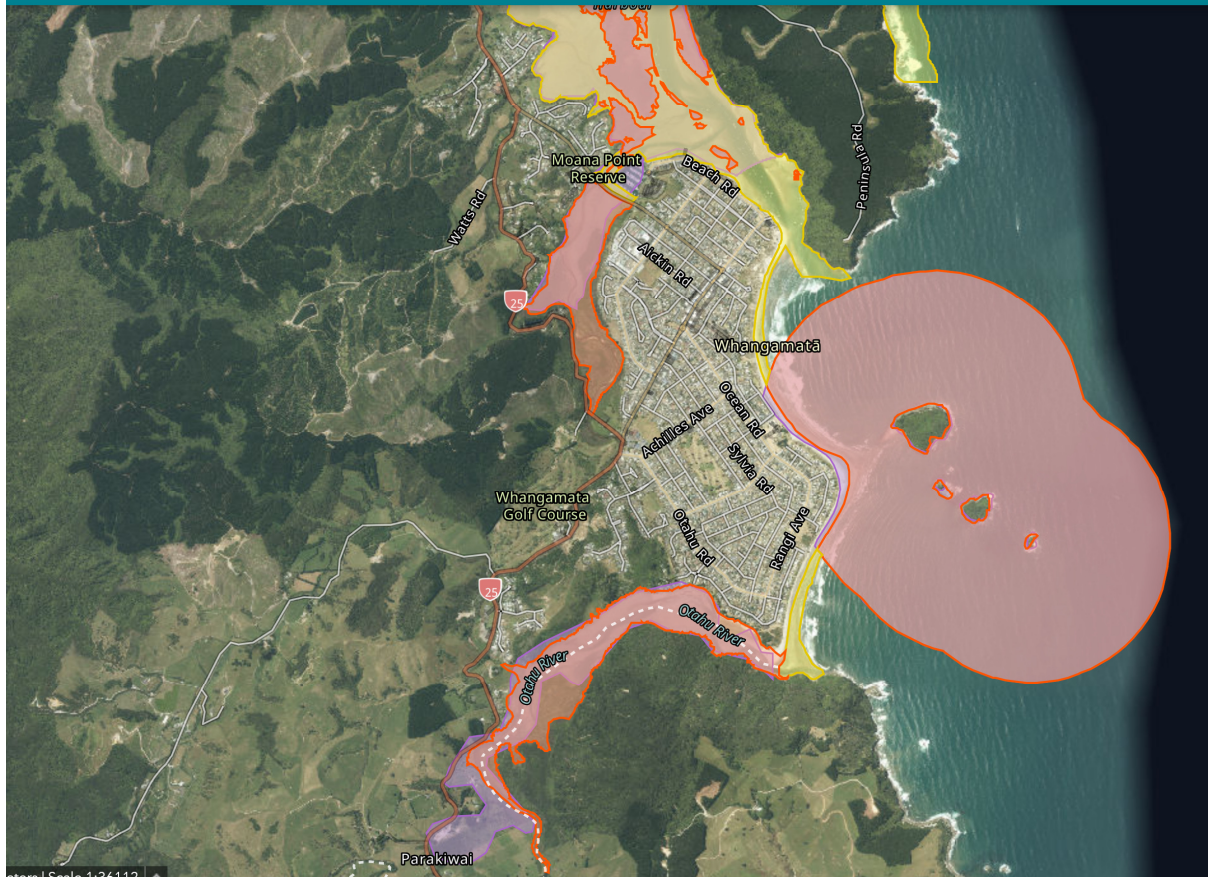
The plan must include actions to reverse what has happened. The plan must include kpi of what is acceptable performance and what is not. Who made this call? Or is no-one prepared to front up in this plan?

In respect to stormwater every millimetre of height above sea level and water table levels means a lot. Every dry gram of sand above the water table level means more rainwater can become absorbed without causing surface flooding.

These are critical especially when we still need to defend the predicted sea level rises and resultant inundation. We certainly don't want to create our own inundation on top of this.

This map I downloaded from WRC website. Noted the Submission Proposal stated maps were attached but they were not.

Proposed Waikato Regional Coastal Plan Maps



What this map highlights to me is the Moanu Anu Anu (pink) has deposits that now back up Wentworth flooding the golf course. It is acknowledged the Golf course is on land designated as a flood plain but it was never envisaged that it would remain flooded for months after a rain event. The reason it remains flooded is because the Moanu Anu Anu has severely silted up, become vegetation areas, and getting worse.

I did some rudimentary measurements off the wharf in the harbour, the Causeway and Truck Bypass bridge on the border road at the end of the pink shade line. What was of interest is the harbour to Causeway tidal change was within 30mm of level difference at 800m approximate distance but the Truck Bypass was over 300mm. This indicates blockage of the CMA. This reflects as higher flood waters over the Golf course and longer periods to drain away.

This is seen visually on the Golf course, but underneath this is affecting the aquifer water table levels. This affects all of us, not just the unlucky golfer finding an ever widening water hazard.

Other sections of the plan I wish to comment on:

Article DD-P6

Providing for maintenance of drainage schemes, navigation channels, or river and flood protection works.

Allow for the maintenance of drainage schemes, navigation channels, or river and flood protection works in the coastal marine area, provided any adverse effects from the disturbance or removal of sediment and other natural material are sufficiently avoided, remedied or mitigated.

I accept this article. I would request this be inserted along with the Local Authority responsibilities.

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Catchment Management Plan:

means a plan for addressing stormwater runoff that is generated within a catchment to meet specific water quantity, water quality and receiving environment objectives. A CMP will determine the best practicable option for managing stormwater at an integrated catchment level and include design parameters and a means of compliance that are specific to the catchment.

I accept this article. I would request this be inserted along with the Local Authority responsibilities.

Pg 18

channel clearance:

means the clearance of vegetation and debris from river channels and river mouths within the CMA to maintain efficient water flow, reduce the risk of flooding and erosion, maintain structures, remove plant pest species and remove hazards for navigational uses.

Includes:

- a. clearing vegetation and debris or cutting vegetation in rivers and streams.
- b. maintenance of land drainage and stormwater systems.
- c. maintenance and clearing of road and drainage and water tables.

Excludes:

- a. Capital dredging.

I accept this article except it is unreasonable to prohibit dredging which has been used successfully in the past for this control. I would request this be inserted along with the Local Authority responsibilities.

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coastal marine area:

has the same meaning as in section 2 of the RMA:

means the foreshore, seabed, and coastal water, and the air space above the water—

- a. of which the seaward boundary is the outer limits of the territorial sea:
- b. of which the landward boundary is the line of mean high water springs, except that where that line crosses a river, the landward boundary at that point shall be whichever is the lesser of—
 - i. 1 kilometre upstream from the mouth of the river; or
 - ii. the point upstream that is calculated by multiplying the width of the river mouth by 5

I accept this article except in rivers without much fall, it is not the distance from a mapping reference point or a specific length, but the extent of the accumulated deposit/sediment and effect it is causing that should be the limitation. I would request this be inserted along with the Local Authority responsibilities with the 1 kilometre revised to reflect the actual problem.

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Maintenance dredging:

means excavating material from the bed of the CMA and removing the excavated material, where the excavation is for the purpose of removing accumulated sediment so that the seabed is returned to previously approved levels.

I accept this article. I would request this be inserted along with the Local Authority responsibilities in place of prohibition of capital dredging.

Pg28

natural hazard risk:

has the same meaning as in section 1.6 of the operative Waikato Regional Policy Statement – Te Tauaki Kaupapahere Te Rohe O Waikato:

the probability or likelihood of specified negative consequence to life, well-being, property, economic activity, environmental or other specified values, due to a particular hazard or group of hazards.

Three levels of risk are identified in the Regional Policy Statement:

a. intolerable: risk which cannot be justified and risk reduction is essential e.g. residential housing being developed in a primary hazard zone;

b. tolerable: risk within a range that a community can live with so as to secure certain net benefits. It is a range of risk that is not regarded as negligible or as something to ignore, but rather as something to be kept under review and reduced if possible; and

c. acceptable: risk which is minor, and the cost of further reducing risk is largely disproportionate to the benefits gained e.g. residential housing being developed beyond coastal setback.

I accept the intent of this article. I would request this amended to include the Building Act section 73. It is accepted a competent local authority would have been complying with s36 of the Building Act 1991 and s73 of the Building Act 2004. It is therefore required of this plan to run parallel meaning as the Building Act requires. Otherwise rules can become manipulated by people by claiming they comply with this CMA plan to intentionally build where they should not and then in time pass that risk to unsuspecting people and then expect society in general will bail them out. Clarity and consistency is required. This becomes the Local Authority responsibilities.

END: