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06/04/2016

BY EMAIL

Dear Jeff,

Re: your request at the Env Court mediation on surfbreak Protection Society (SPS) supplying some relevant information that you could take back to your clients regarding withdrawal of deletion of Kaituna Cut from the schedule in the BOP Proposed Regional Coastal Environment Plan.

We would like you to consider locations that have had groynes constructed for the purpose of safe boating in and out of rivers and estuaries we would like you consider the groynes of Greymouth and Westport where excellent surfing waves have been created or enhanced by these structures, and are recognised in the New Zealand Wavetrack surfing guide Cobden Wall and Blaketown, both registering 8 on the books stoke meter(numbers 415 and 416).

Also we have enclosed two bathymetric maps produced by DHI International of one; Whakatane Heads (a broken sea wall) requested by the Whakatane District Council which the council wishes to improve harbour access without detriment to surf break, which rates a 9 in the Wavetrack guide and recognised in the BOP Regional Policy Statement, and two; South Stradbroke Island, recently made part of the World Surfing Reserve on the Gold Coast Queensland Australia, an economic study done by Dr Neil Lazarow on behalf of Queensland Government calculated it was worth \$22 million per year to the Queensland economy.

It is our experience that where surfbreaks are located, this increases positive social and economic effects and enhances amenity values and peoples health and wellbeing etc. it is also our experience that surfbreaks can increase the desire for and value of, coastal real estate for example Whale Bay Raglan Stent Rd Taranaki.

On this basis we would like your clients withdrawing their submission on deletion of the Kaituna Cut Surfbreak from schedule 5 of the Regional Coastal Plan, and consider mitigation or remedy as a way forward when their project transpires.

Kaituna Cut surf break
a high quality surfing
wave as illustrated in
this photo.



The Kaituna Cut is recognised in numerous surfing guides, online and in print, including **A Guide to Surf Riding in New Zealand** (4 editions first published in 1968) **The Wavetrack New Zealand Surfing Guide** with a 7 out of 10 on the stoke meter, "which can produce Kirra(top Australian surf break) - like right hand screamers." **"Spot X Surfing New Zealand."** Which gives it a 6 out of 10 and states: "Well worth a surf check as it offers good tubes and plenty of grunt." The New Zealand. **The Good New Zealand Beach Guide** "It can have grinding waves off either side off the mouth with substantial sand banks created by the rivers flow, that holds a bit of size." This amounts to nearly 50 years in publication as a regionally significant surf break.

Excerpts from DHI Wellington Airport Runway Extension Surf Break Impact Assessment:

2.2.2 Whakatane Coastal Processes Study (New Zealand)

Project Aim

DHI were commissioned by Whakatane District Council to investigate the effectiveness of a range of options to achieve the best result in terms of improved navigation through the Whakatane Harbour Entrance while taking into consideration other recreational and environmental constraints, of which surf amenity at the river mouth was one (DHI, 2011).

Methodology

MIKE21 BW Boussinesq wave modelling was used to calculate the detailed wave transformation and breaking for two selected offshore wave condition scenarios. Scenario 1 included a highly energetic condition while scenario 2 comprised of the most frequently occurring wave condition. OPTISURF was then used to analyse the surf quality of the produced wave field.

For each breaking wave the transition point between broken and unbroken wave was traced until the wave breaking terminated. Each cycle was logged as a surfable ride along with information on the ride length, peeling speed and breaking wave height.

Outcomes

An example of the output from OPTISURF for the river mouth is presented in **Figure 2-4**. The results revealed key features of the surfing break such as the take-off zone in proximity to the navigation channel. Both scenarios were found to provide ride lengths of over 400m. Variations in ride return periods were distinguished for each scenario, being of 1 ride in every 5.5 minutes for scenario 1 and 12 minutes for scenario 2. The analysis highlighted a strong link between the orientation, length and continuation of the river mouth bar and the quality of the surfing amenity foremost expressed in terms of the potential length of the surf ride. The project is currently on hold with a detailed assessment of potential options awaiting further approval. Further stages of surfability assessment would involve the proposed navigation works on changes to the bathymetry, wave direction and changes in the wave driven currents, requiring more scenarios to be considered and assessed.



Whakatane Heads a good example of a partially modified river mouth with an excellent surf break listed in the Bay Of Plenty Regional Coastal Statement. The Whakatane District Council carrying out research for preservation rather than deletion.

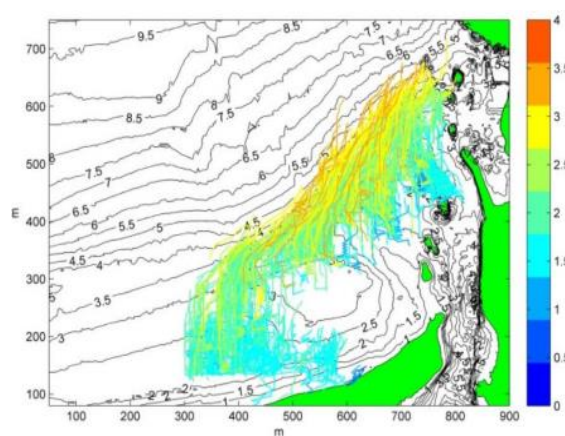
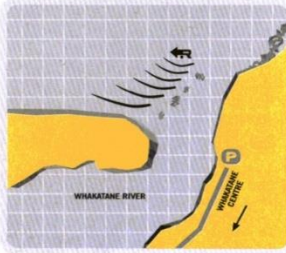


Figure 2-4 OPTISURF Illustration of the length and size of all possible surf rides over the course of 1 hour – Whakatane (NZ) The colour scale indicates the maximum breaking height experienced along the ride.

Referenced from: DHI Wellington Airport Runway Extension Surf Break Impact Assessment.

<http://www.connectwellington.co.nz/static/documents/06-WIAL---Draft-Surf-Break-Impact-Assessment.pdf>

254 BP3



Whakatane Heads

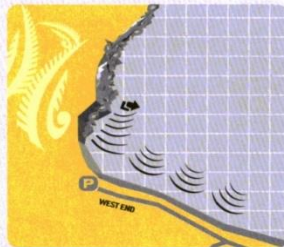
Whakatane is a little over an hours drive from Mt Maunganui on HWY 2. Drive through Whakatane township to the Heads.

Here you'll find a quality right-hand river bar break. Expect a sucky takeoff, followed by a fast workable wall peeling for 100m. Get to the break by paddling across the entrance. Watch out for fishing boats and heavy rips on the outgoing tide. Consistent break - picks up north, northeast and wrapping east swells. Offshore south-southwest. Best low through to mid tide. Crowded and intense takeoff. Competent surfers.

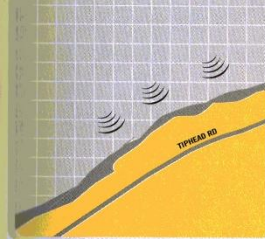
Ohope

Head over the hill from Whakatane. At the bottom of the hill take a left to the west end.

Beach break and occasional left point break at the northern end of the beach. Quality of left point depends on sand build-up. Combination of peaks and occasional long-walled beach break. Mellow fun waves up to 4ft (1.5m). Picks up east and southeast swells. Great learners wave.



WC2 429



Shingles

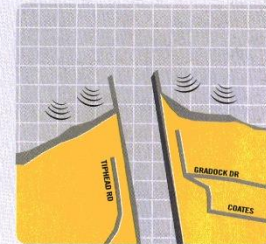
Find Shingles west of the Buller River at Westport.

Various left and right peaks break over shifty banks which are constantly changing due to water movement. Murky water. Spooky place to surf. Optimum wave size 2-4ft (1.5-1m). Good for surfers of all levels.

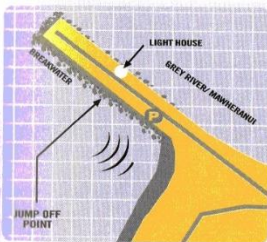
Westport Breakwater

Head to the breakwater located at the Buller River Mouth, Westport.

Break features peaky left and right-handers on a northwest swell (best angle). Be ready for sucky takeoffs and pitching lips which throw out wide. Break is prone to strong currents and heavy water movement. Chilly surfing as cold fresh water spills out from Buller River. Optimum 3-5ft (1-1.5m). Uncrowded. Sharky murky water. Competent surfers.



WC1 415



Blaketown

Head to the southside of the Grey River. Follow the road around the lagoon to the break.

Spot features a grunty peak/right-hander next to breakwater. Expect sucky fast bowls which throw out as far as the wave is high - very hollow and gnarly. Also find various left and right peaks further down beach depending on bank location - banks are shifty. Holds 6-8ft (2-3m). Optimum wave size 4-6ft (1-2m). Break is still pushy and grunty when it's 2ft. Expect heaps of drift. Paddle out through rip next to breakwater or jump off the rocks. Uncrowded. Intermediate to expert level surfers.

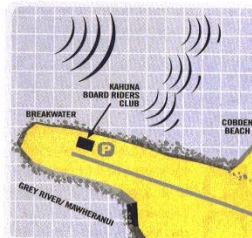
Wavetraps

Find Wavetraps on the north side of the Grey River. Break is located on a small beach inside the river mouth. From Cobden take the road out to the breakwater.

Break features a short sucky right-hand peak breaking over part boulder, part shingle. Spot is surfed when swell is huge and everywhere else is closing out. Spot has its hazards - beware of turds (from sewer pipe), large floating driftwood and even the odd dead cow floating down the river. Optimum wave size 2-4 ft (1.5-1m). Good for surfers of all levels surfers especially hardened West Coast grommies.



416 WC1



Cobden

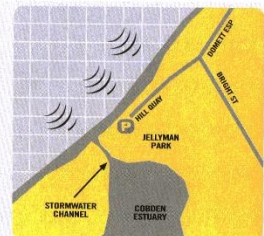
Head to the north side of the breakwater at Greymouth.

Home of Kahuna Boardriders Club. Break features changeable shifty bars with a big mean hollow right peeling into breakwater. Expect ledgy drops and tight barrels - stay high in the pocket. Sometimes you'll find a grunty left as well. Super tough paddle out especially when it's big. Best entry is to jump off the rocks (watch out they're very slippery). Paddle out through bar when big. Break picks up all swell directions and handles 2ft (1.5m) through to 15ft (5m). Best for intermediate to expert level surfers.

The Channel

From HWY 6 take Bright St through Cobden, turn left at the Esplanade.

Here you'll find various beachies featuring quality short punchy peaks with long walls and multiple high-performance sections. Sand banks are shifty and change often. Handles solid 6ft. Optimum surfing on a small swell 2-4ft (1.5-1m). Good break for surfers of all levels.



Examples from the Wavetrack N.Z. Surfing Guide listing high quality surf breaks with a co-dependency on groynes created for safe navigational passage.

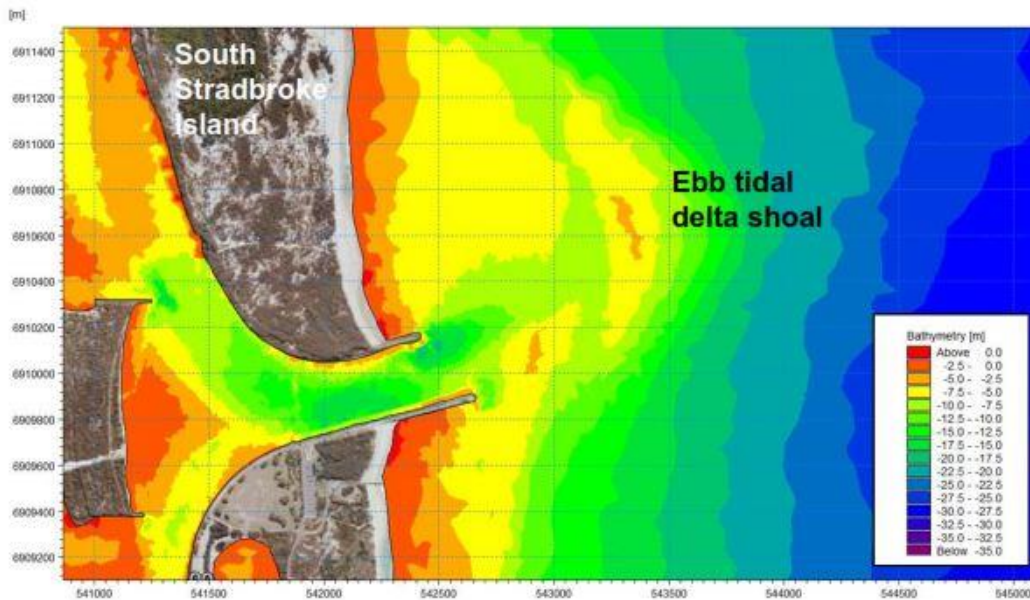
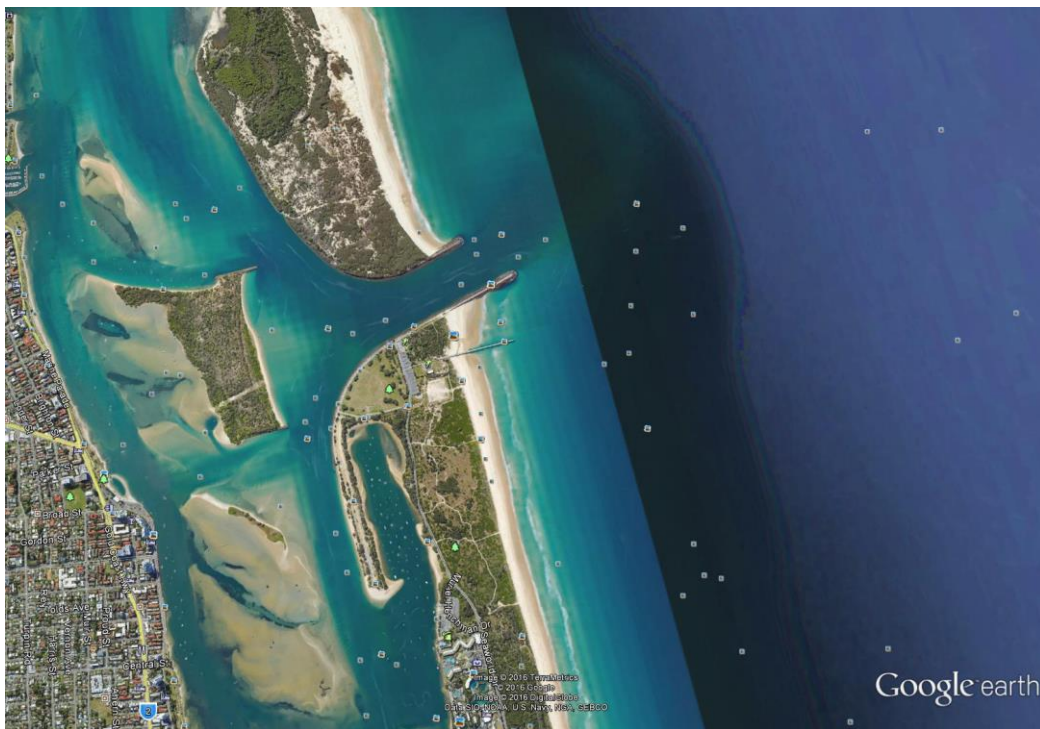


Figure 8-1 Ebb tide delta shoal offshore of South Stradebroke Island.

Referenced from: DHI Wellington Airport Runway Extension

Surf Break Impact Assessment. <http://www.connectwellington.co.nz/static/documents/06-WIAL---Draft-Surf-Break-Impact-Assessment.pdf>





We would encourage your clients to read these documents emphasising the positive economic value of surf breaks. In conclusion SPS are of the opinion that your proposed Groynes may be considered for mitigation in conjunction with robust surf science regarding Kaituna Cuts surfbreaks, and should be discussed when applying for consent.

<http://gecko.org.au/download/reports/Analysis%20of%20AEC%20Business%20Report.pdf>

http://www.valueofwaves.org/uploads/1/1/4/2/11420190/lazarow_2008_final_report_socioeconomic_study_of_recreational_surfing_on_the_gold_coast_lowres.pdf



If you need any further information please feel free to contact me.

Kind Regards

Paul Shanks

President; Surfbreak Protection Society Inc.

mobile: 021 2671492

Kaituna evidence Surf break Protection Society.

Introduction

The Surfbreak Protection Society Inc. (SPS) is a representative group of surfers and friends dedicated to the conservation of the "treasures" of the New Zealand Surfing Community (and public generally) - our surfbreaks - through the preservation of their natural characteristics, water quality, marine ecosystems, amenity and recreational values and low impact access for all. We strive to be Aotearoa's "Guardians - Trustees" of our surfbreaks and the natural environments that complement them.

Since its establishment in 2006, SPS has successfully been involved with incorporating surf break preservation and sustainability into policy prepared under the Resource Management Act 1991 (RMA). SPS was a successful submitter on the New Zealand Coastal Policy Statement 2010¹ (NZCPS) containing national direction on surf break protection.

At the Board of Inquiry to the NZCPS the expertise of SPS was recognised by way of accepting our definition of a surf break and surfable wave;

"A natural feature that is comprised of swell, currents, water levels, seabed morphology, and wind. The hydrodynamic character of the ocean (swell, currents and water levels) combines with seabed morphology and winds to give rise to a "surfable wave". A surf break includes the 'swell corridor' through which the swell travels, and the morphology of the seabed of that wave corridor, through to the point where waves created by the swell dissipate and become non-surfable. 'Swell corridor' means the region offshore of a surf break where ocean swell travels and transforms to a 'surfable wave'. 'Surfable wave' means a wave that can be caught and ridden by a surfer. Surfable waves have a wave breaking point that peels along the unbroken wave crest so that the surfer is propelled laterally along the wave crest."

SPS has also been involved with a number of cases protecting the qualities and enjoyment of surf breaks from inappropriate subdivision, use and development in the coastal environment. This is in regard to issues such as maintaining water quality, access to breaks and wave quality of breaks. SPS is the leading surf break preservation and sustainability organisation in New Zealand and a key stakeholder/surfing interest group in the country's coastline; with its purpose of protecting surf breaks now mandated by national policy direction in the NZCPS and by regional policy direction, for example, in the Taranaki

¹ The New Zealand Coastal Policy Statement 2010 was issued by notice in the New Zealand Gazette on 4 November 2010 and took effect on 3 December 2010.

Regional Policy Statement 2009, Waikato Regional Policy Statement, Northland Regional Policy Statement, The Wellington Proposed Natural Resources Plan, the Bay of Plenty Regional Policy Statement, and continue to consult and submit on other regional plans.

It should be noted that from the New Zealand Coastal Policy Statement;

Policy 13 Preservation of natural character

- (1) *To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:*
- (a) *avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and*
 - (b) *avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment;*

including by:

- (c) *assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and*
 - (d) *ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions.*
- (2) *Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:*
- (a) *natural elements, processes and patterns;*
 - (b) *biophysical, ecological, geological and geomorphological aspects;*
 - (c) *natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;*
 - (d) *the natural movement of water and sediment;*
 - (e) *the natural darkness of the night sky;*
 - (f) *places or areas that are wild or scenic;*
 - (g) *a range of natural character from pristine to modified; and*
 - (h) *experiential attributes, including the sounds and smell of the sea; and their context or setting.*

Policy 15

Policy 15 Natural features and natural landscapes

To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:

- (a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and*
- (b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment;*

including by:

- (c) identifying and assessing the natural features and natural landscapes of the coastal environment of the region or district, at minimum by land typing, soil characterisation and landscape characterisation and having regard to:*
 - (i) natural science factors, including geological, topographical, ecological and dynamic components;*
 - (ii) the presence of water including in seas, lakes, rivers and streams;*
 - (iii) legibility or expressiveness—how obviously the feature or landscape demonstrates its formative processes;*
 - (iv) aesthetic values including memorability and naturalness;*
 - (v) vegetation (native and exotic);*
 - (vi) transient values, including presence of wildlife or other values at certain times of the day or year;*
 - (vii) whether the values are shared and recognised;*
 - (viii) cultural and spiritual values for tangata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features;*
 - (ix) historical and heritage associations; and*
 - (x) wild or scenic values;*

- (d) *ensuring that regional policy statements, and plans, map or otherwise identify areas where the protection of natural features and natural landscapes requires objectives, policies and rules; and*
- (e) *including the objectives, policies and rules required by (d) in plans.*

Gives clear direction to regional councils to protect surf breaks by mapping or otherwise identifying these areas of very high natural character.

Resulting from our submission to the Bay Of Plenty Regional Policy Statement: *The regional council also initiated a Surf Break Study in 2010 (Peryman, 2011b) One member of the BOPRC staff acknowledges that proposed policy provisions for surf breaks have been influenced by the Bay of Plenty Surf Break Study and a range of 'eloquent' submissions by individuals representing Surfbreak Protection Society and Bay Boardriders Club during the hearings process seeking changes that were largely accepted. Recognition and support for identified surf breaks was also submitted by Ngati Tuwharetoa (BOP) Settlement Trust and accepted by Council².*

What eventuated was the following policy in the Regional Policy Statement:

Policy CE 2B: Managing adverse effects on natural character within the coastal environment
 Preserve the natural character of the coastal environment and protect it from inappropriate subdivision, use and development by including provisions in regional and district plans, and when making decisions on resource consents to:

- (a) Avoid adverse effects of activities on the attributes that comprise natural character in areas of the coastal environment with outstanding natural character as identified in the maps and tables in Appendix I and J;
- (b) Avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on the attributes comprising the natural character in all other areas of the coastal environment, recognising that areas identified in maps in Appendix I as having high or very high natural character can be especially sensitive to the adverse effects of inappropriate subdivision, use and development; and
- (c) **Recognise that open coastal water in the region is of at least high natural character.**

Explanation
 Policy CE 2B comprises three parts. Part (a) requires the complete avoidance of adverse effects of

² [Planning approaches for the management of surf breaks in New Zealand](#) Matt Skellern, Bailey Peryman, Shane Orchard, and Hamish Rennie

inappropriate activities on the attributes of areas of the coastal environment with “outstanding” natural character. These areas are mapped in Appendix I. Part (b) requires avoidance of significant adverse effects on attributes comprising natural character in all other areas and that activities avoid, remedy or mitigate adverse effects on the natural character attributes of all areas of the coastal environment. Part (c) clarifies the natural character status of open coastal water and Policy 13 of the NZCPS 2010 will apply, recognising the blanket ranking of the open coast may require site specific assessment. This policy confirms that the effects of some activities may not be adverse in light of an areas’ natural character attributes and a consideration of whether the activity itself is appropriate in this location. For example, the attributes for Tauranga Harbour include channel markers (scattered throughout the harbour and visible during the night time) and commercial areas. These features diminish natural character but comprise the harbour at the time it was assessed. Suitable provisions in regional and district plans may include policies, rules and zones to direct inappropriate activities away from areas susceptible to the loss of natural character. Measures should provide for the existing lawfully established activities, subdivisions, designations and zonings and their continuance and development in a way that maintains or enhances the natural character values of the area.

Policy CE 8B: Ensuring subdivision, use and development is appropriate to the natural character of the coastal environment
When assessing the effect of subdivision, use and development on the natural character of the coastal environment, particular regard shall be given to:

- (a) The level of natural character as shown in Maps in Appendix I, as described in Appendix J, and the level of protection to be afforded by Policy CE 2B;
- (b) The criteria contained in Set 1 of Appendix F to further refine natural character for resource consents or site-specific mapping;
- (c) Maintaining coastal margins in a natural state and protecting the natural values of beaches and dune systems, including their ability to reduce the impacts of coastal hazards such as tsunami and storm surge;
- (d) The appropriateness of the introduction or accumulation of man-made modifications recognising activities that are:
 - (i) planned (consented, zoned or designated);
 - (ii) provided for in reserve management plans; or
 - (iii) identified in Appendix C, D and E; or
 - (iv) lawfully established;
- (e) The provisions of Customary Marine Title Management Plans;
- (f) Subject to Policy CE 2B avoiding significant adverse effects and avoiding, remedying or mitigating

(including, where appropriate, through provision of buffers) other adverse effects on:

- (i) Visually, ecologically or culturally sensitive landforms, including ridgelines, coastal cliffs, beaches, headlands, and peninsulas and visually prominent public open space;
- (ii) Estuaries, lagoons, wetlands and their margins (saline and freshwater), dune lands, rocky reef systems and areas of eelgrass and salt marsh;
- (iii) Terrestrial and marine ecosystems;
- (iv) Natural patterns of indigenous and exotic vegetation and processes that contribute to the landscape and seascape value of the area; and
- (v) Regionally significant surf breaks and their swell corridors, including those at Matakana Island and the Whakatāne Heads;
- (g) Encouraging efficient use of occupied space through intensification and clustering of developments, rather than sprawling, sporadic or unplanned patterns of settlement and urban growth;
- (h) Setting buildings and structures back from the coastal marine area and other waterbodies where necessary, practicable and appropriate to protect natural character, open space, public access and amenity values of the coastal environment, while recognising some structures may have a functional need to be located in the coastal environment, for which a setback would be inappropriate.

Explanation

Policy CE 8B recognises that in some areas natural character has been mapped and directs decision makers to consider the appropriateness of development having regard to Policy CE 2B and local-scale considerations. Part (a) applies only to the mapped areas.

The policy identifies particular elements, features and patterns which, if present, in the coastal environment require a higher level of protection from development in terms of avoidance, remediation or mitigation of adverse effects. This policy will ensure that subdivision, use and development are appropriate for the characteristics of the area and will not result in significant adverse effects on the natural character of the coastal environment.

Objective 6 and Policy 7 of the NZCPS 2010 recognise that there are competing needs in managing

activities in the coastal environment. The protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits. Sub-paragraph

(d) recognises that in managing adverse effects there is also a need to take into account planned development and the needs of existing uses, such as rural activities.

The extent to which particular activities are appropriate within the coastal environment is a matter for the

Regional Coastal Environment Plan to define. That plan will recognise the rights conferred to owners of consents, provided for in existing operative plans or proposed by way of details in Appendices C and D

(growth area timing and sequencing and business land provisions) of this Policy Statement. Special “classes” of development, including proposal by Tangata whenua and minor works consistent with Reserve Management Plans will be considered in the Regional Coastal Environment Plan. Surfing is an economically and socially important activity in parts of the Bay of Plenty. Breaks such as Matakana (i.e. Puni’s Farm) have featured in the international media and together with Whakatāne Heads are considered to be of regional significance. It is therefore appropriate that particular regard is had to avoiding, remedying of mitigating potential adverse effects on regionally significant surf breaks and their swell corridors

Surf breaks are a natural characteristic, and part of the natural character and landscapes, of the New Zealand coastline/coastal environment, of which there are few when compared to the total length of the New Zealand coastline³.

Approximately 7% [310,000] of New Zealanders are estimated to “surf “on a regular basis⁴. Surfing makes a valuable contribution to the wellbeing of New Zealanders by promoting health and fitness, cross-cultural and intergenerational camaraderie and a sense of connection to, and respect for, New Zealand’s coastal environment and resources. In terms of Part 2 of the RMA surf breaks, therefore, contribute to amenity values/recreational amenity and natural character of the coastal environment; surf breaks and surfing enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety.

Surf breaks under the Resource Management Act

The maintenance and protection of surf breaks is relevant to several aspects of the RMA, particularly the purpose and principles of the RMA (sections 5, 6, 7, and 8).

Section 5 Purpose

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, **sustainable management** means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people*

³ Scarfe (2008) states that there is only: “one surfing break every 39km to 58km. Many of these surfing breaks are only surfable a few days per month or year when the tide, wind and wave conditions are suitable.”

⁴ Figures sourced from SPARC

and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while—

- (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

Surf breaks are a “natural and physical resource” to be sustainably managed under the RMA. Surf breaks contribute to the “social, economic and cultural wellbeing and the health” of people and communities by providing for the recreational activities of people; but also have wider social and economic benefits - in terms of, for example, the economic activity of the local area and region - and creation of a distinctive sense of place and identity for communities close to surf breaks. International research demonstrates that surf breaks provide for significant social and economic benefits for people and communities.

There are several places in the Bay of Plenty region where surfing is an important element of the character and culture of the local area. Surfing is an activity which draws people to live in the local area and attracts tourists and visitors. In total, the variety and scale of surf breaks around the Bay of Plenty region contribute to the character, attractiveness and amenity values of the region. The coast and beaches are consistently given as a key reason as to why people choose to live in coastal communities of the region. In some cases; the rationale to live on the regions coasts relates directly to the opportunities for surfing. However, it is clear that the accessibility of the coast and the range of different activities that are possible around the coast also contribute to the wellbeing of people and communities.

Globally, the numbers of people involved in surfing has increased significantly over recent decades and is expected to rise. At the same time, pressure for development along the coast is growing. Ensuring appropriate management of any potential conflict between such uses of limited coastal space is part of the council's responsibility to meet the reasonably foreseeable needs of future generations; and to avoid, remedy or mitigate any adverse effects of activities on the environment.

Section 6 Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) the protection of the natural character of the coastal environment
(including the coastal marine area), wetlands, and lakes and rivers and
their margins, and the protection of them from inappropriate
subdivision, use, and development:*
- (b) the protection of outstanding natural features and landscapes from
inappropriate subdivision, use, and development: ...*
- (d) the maintenance and enhancement of public access to and along the coastal
marine area, lakes, and rivers: ...*
- (e) the relationship of Maori and their culture and traditions with their ancestral lands,
water, sites, waahi tapu, and other taonga:...*
- (f) the protection of historic heritage from inappropriate subdivision, use and development.*

The matters of national importance in section 6 RMA are relevant to the consideration of surf breaks in a number of ways; for example, because surf breaks are natural features and their use and enjoyment depends on public access to the coastal marine area. Surf breaks are, for example, an element of the natural character and landscape of the coastal environment.

Nationally and internationally, numerous surf breaks have been modified by coastal engineering activities, but they still contain a degree of natural character. The nature and amenity values of the surfing experience is also affected by the natural character of the surrounding area.

Public access to a surf break is fundamental to its use. Such access can be enhanced by works such as walkways and car parks, or can be diminished through activities, such as subdivisions or coastal reclamation which block informal access.

Section 7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to:

- (a) Kaitiakitanga:*
- (aa) the ethic of stewardship:*

(c) the maintenance and enhancement of amenity values⁵: ...

(f) maintenance and enhancement of the quality of the environment:

(g) any finite characteristics of natural and physical resources: ...

In places where surf breaks are located, they provide a major element contributing toward the amenity values of an area. This is because they provide for and contribute to people's appreciation of such areas pleasantness, aesthetic coherence, and cultural and recreational attributes – not only for those people surfing - but also for the enjoyment of people in a community (as well as visitors to a community) generally who, for example, watch surfers and waves from the land. Maketu – Kaituna Cut and its surf is high in amenity values for all of these reasons.

Therefore, maintenance and enhancement of the quality of these 33 surf breaks in the Bay of Plenty environment is important for retaining the significance of the surfing experience in its communities and Natural Character, and Landscape (Seascape) .

Surf break attributes as sources of value

The Board of Inquiry Report and Recommendations Volume1: Findings, Recommendations and Recommended NZCPS (2009) stated that:

“The economic value of surfing to tourism and the social benefits should not be underestimated.”

Studies have been conducted overseas regarding the economic benefits of surfing - a branch of research that has come to be known as Surfonomics.

One of the most well-known reports is: *A Socioeconomic and Recreational Profile of Surfers in the United States: A report by Surf-First and the Surfrider Foundation* prepared by G. Scott Wagner, Chad Nelsen, and Matt Walker 2011.

The study surveyed the demographics of surfers listing their income range and expenditure when travelling to a surf break, to quote from the report:

“Surfers in the U.S. are experienced and avid athletes who make expenditures in coastal communities each time they surf. Survey responses indicate that the average surfer has 16 years of experience and surfs early in the morning for 2.5 hours and average 108 times per year. On each visit, expenditures will average \$66 on items such as food, gas,

⁵ Amenity values means those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes: section 2, RMA.

rental equipment, lodging, and/or merchandise. The 3,916 respondents went surfing a total of

557,310 times in the past year and assuming a mean expenditure of \$66 during each visit, generated an economic impact of \$36,782,460. This represents a very small population of surfers relative to the total number of surfers in the U.S. (Wiley et al., 2006).

Based on Leeworthy and Wiley's (2001) estimate of about 76 million annual surf visits and using \$25 as a conservative value from Hanemann et al. (2004) and \$66 found in our survey, we estimate a range for the annual economic impact from U.S. surfers that could be from \$2 billion/year to \$5 billion/year."

While such studies are in their infancy in New Zealand, one study has been conducted on the value of surf breaks culturally, socially and economically, with case studies of both the Bay of Plenty and the Gisborne regions:⁶

"The objective of this study was to investigate the perspectives of coastal communities on surf breaks in two different regions in New Zealand in order to identify values for their effective management. In particular, the study sought information on the attributes of surf breaks that contribute to these values to identify potential implications for the management of these environments in the New Zealand policy context."

"Surf breaks are a finite natural resource contributing to the health and well-being of individuals and communities. The results from case studies conducted in two regions in New Zealand illustrate that a wide range of attributes contribute to the values of surfbreaks. These are typically site specific features that are often unique to the individual location."

And;

"Significant economic activity derived from tourism was also identified in both case study regions. One respondent noted that "Tourism alone... the economic potential is huge... Council or those running tourism don't quite realise how strong surfing is..."

⁶ Understanding the values associated with New Zealand surf breaks and implications for management by Preston Bailey Perryman and Shane Orchard (GIVE YEAR – agree – need to reference this – also need page or paragraph numbers relating to the quotes)

“In both case study regions, the experience of visiting or observing these parts of the coastal environment was also identified as a source of benefits. This is in addition to recreational activities such as riding waves, as one respondent stated, surfing is “...culturally, more than recreation”. Another added there is “a connection to sealife and an affinity with those that surfers share the ocean with. It is not just about surfing the sea, surfers can make that connection... and are in harmony with the wairua (spirit), the buzz that Maori feel in a different way, but hearing the same tune”.

Surfing nationally and internationally is a multibillion dollar industry, as various studies have established.

Some studies have been done in New Zealand concerning the economic potential to local economies of Opunake and Mount Maunganui with regard to proposed artificial surf reefs. Based on attracting 50 surfers per surfable day, the Mt Maunganui reef was estimated to generate \$500,000 of annual expenditure, locally.

The Opunake surf reef was estimated to have additional expenditures of \$288,120 by Year Five. With these sorts of figures estimated for artificial surf reefs, SPS believes that before any degradation of natural surf breaks take place, particularly those with a high natural character, amenities and access in an urban environment a full economic assessment of that surf break's integration into the local economy should be under taken. The developers of Kaituna have not considered the economic value of the surf break to sell reality and for the new community of 7500 lots and possibly 30,000 people that they will create, where 1500 of those inhabitants would surf if you extrapolate that 7% of NZers surf.

SPS support the retention of the Kaituna Cut in Schedule 5 of the Bay Of Plenty Regional Coastal Environment Plan and the decisions version of Policy RA 1 in the afore mentioned plan:

- | | |
|-------------|---|
| Policy RA 1 | <p>Protect access to, and use of, the regionally significant surf breaks identified in Schedule 5 (Regionally Significant Surf Breaks), by ensuring that:</p> <ul style="list-style-type: none">(a) Any activities requiring resource consent that have the potential to have a significant adverse effect on the quality of, or access to, these surf breaks, on a permanent or on-going basis are avoided;(b) Any activities in the coastal marine area requiring resource consent that are proposed within a 1 kilometre radius of the surf breaks as mapped in Schedule 5 clearly demonstrate that |
|-------------|---|

the proposed activity will not have a significant adverse effect on wave quality, consistency or rarity or values associated with natural character (such as coastal processes, currents, water levels and seabed morphology), amenity or cultural heritage that contribute to the characteristics of the surf break; and

- (c) Other adverse effects on regionally significant surf breaks and their swell corridors are avoided, remedied or mitigated.

Further to the submission:

The bay of Plenty exudes surfing culture and this has been recognised recently with the New Zealand Herald displaying images of surfers at Mount Maunganui.

The Kaituna Cut has been identified in at least five major surfing publications:

International surf location Website; <http://www.surf-forecast.com/breaks/Kaitura-Cut>

Wayne Warick's 1968 " *A guide To Surfing in New Zealand*

Pita Ngaru and Mark Airey: *Spot X Surfing New Zealand (a guide to over 300 surf spots in New Zealand)*

Tim Rainger : *Best beaches of New Zealand*

Peter Morse: *The Wavetrack New Zealand Surfing Guide*

The Wavetrack New Zealand Surfing Guide (Morse & Brunskill, 2004) was also accepted as a legitimate identification proxy by the NZCPS Board of Inquiry (2009a, pp. 132–133) for identifying breaks of national significance. It follows on that from the wave track guide, the book is also a legitimate proxy to regionally significant surf breaks.

Appendix XX is a CV of the expertise and experience of a foremost and well recognised New Zealand surfer Peter Morse



[Jobs]

Scan and copy qualifications of the Kaituna Cut from all publications into the submission

Tourism CEO still surfs a short board.

Amount of people in NZ that surf.

Recognise that open coastal water in the region is of at least high natural character.

A surf break is something unique in open coastal waters, therefore it follows it must be of very high natural character or outstanding.

Measure length of BOP coast and length of ride

The Kaituna Cut surf break is recognised as a 6 out of ten in numerous publications

Bailey Peryman Report SPS was at one of workshops thought was attended by informed people even if Paul did not know them all.

Northland gather surfing experts and SPS

Wellington hired E_Coast for the identification and mapping for the GWRC proposed Natural Resources Plan

Auckland did online survey 1500 responses plus in house expertise McNeil Coombs DR Scarfe and accepted 33 breaks of wave track

Waikato has hired E-coast for Draft Coastal Plan

Wording from Auckland unitary Plan on surfing and did they accept 33 surf breaks of wave track guide

Wording for Taranaki

Hauraki marine management plan re dredging

Planning approaches to management of surf breaks.

NZCPS volume 2 policy 16

Defended Nationally significant surf breaks in SPS vs Port Otago

Tourism has now exceed all other industries as biggest income earner and that is because of NZ Pure-ie high to outstanding natural character and high to outstanding seascapes which is surfing anytime in the Hearld they advertise gold coast they have a person with surfboard as they do for The Mt coast which now is Matakana to the end of Papamoa and soon to include the suburb of Kaituna

The air NZ in flight saftey video (won a prize)was about surfing in NZ and the CEO of Tourism NZ in his RV identifys as a Surfer

Surfing is recognised by the Govt and its contribution to our tourist economy by granting Surf NZ \$1.25 m. for Ultimate Waterman filmed and shown all around the world show casing natural character and land/seascapes to ensure that is protected they Granted e-Coast \$1.25m by way of MBIE to study 7 surfbreaks-all in wavetrack guide.

International Olympic committee has now put surfing into the 2020 olympics so we need to maintain the training grounds(surfbreaks for such athletes now and to the future infact one of the leading athlete is Kahu Butler of Akataki only stones through from K-Cut