

Proposed Auckland Unitary Plan (PAUP) Submission

Submission by the Tamaki Drive Protection Society

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Orakei Local Board Area

This is a submission on the proposed Auckland Unitary Plan.

The Society could not gain an advantage in trade competition through this submission.

The Society wishes to be heard in support of the submission.

Introduction

The Society is an incorporated society with charitable status. The purpose of the Society is to promote the public use and preservation of Tamaki Drive as a public amenity. **The Society's area of interest** is wider than that of a particular suburb. *The Tamaki Drive Master Plan* expands the Society's focus area to the beaches and open spaces including the Whenua Rangitira, the local seaside villages and the hinterland suburbs. The inland boundaries are Maskell St, St Heliers Bay Rd, Kepa Rd and the railway line to Quay St. Major achievements of the Society include working with the former Auckland City Council resulting in *The Tamaki Drive Design Guideline (1992)*, and **inclusion of Tamaki Drive as a Scenic Way needing visual and environmental protection, in the City of Auckland - District Plan Operative 1999**. Over the years these documents have been relevant to many proposals and activities. ***The Tamaki Drive Master Plan, issued by the Auckland Council and led by the Orakei Local Board, now provides another strong vision for the future.*** Reference should be made to www.tamakidrive.org.nz for further details of the functions of the Society.

The submission represents the views of the management committee, and addresses the following critical issues:

1. the status of Tamaki Drive and the Tamaki Drive Master Plan
2. incorporation of Tamaki Drive Design Guideline, and Scenic Way references
3. extension of the Coastal Protection Yard to Tamaki Drive
4. Support expansion of St Heliers character overlay
5. protect character and foreshore at Mission Bay and Kohimarama by new character overlay
6. promotion of widening the carriageway/ construction of boardwalk/promenades
7. preservation of pohutukawa trees on cliffs surrounding the harbours

8. prohibition of Billboards in Character defined Areas such as St Heliers Village, and the Public Open Space along or visible from Tamaki Drive and on the seaward side of Tamaki Drive
9. Hauraki Gulf Marine Park Act 2000 – application to Tamaki Drive

Reasons for submission and decisions requested:

1. Tamaki Drive Master Plan

The first six points of the submission arise from the fact that the Unitary Plan has radically altered the current status of Tamaki Drive. Firstly it fails to recognize or incorporate the Tamaki Drive Master Plan, [**Tamaki Drive – a place for people**], being an important policy document approved by the Orakei Local Board and the Auckland Council in February 2013, after a long consultation and submission process. The Tamaki Drive Master Plan contains a comprehensive and definitive vision for the future use and improvement of Tamaki Drive. The Society strongly endorses the Master Plan as consistent with sustainable management under the RMA and in accordance with policies under the Auckland Spatial Plan 2012. The Master Plan refers to the need for the Unitary Plan to support its objectives. It states that the Unitary Plan is an important tool in the key move to improve the quality of the environment in the seaside villages, but the proposed Unitary Plan does not acknowledge the Master Plan objectives and by implication renders it ineffective.

Decision requested

That the **Tamaki Drive Master Plan**, issued by the Orakei Local Board and the Auckland Council in February 2013 be given specific status under the Unitary Plan by incorporation, or by referral as a relevant document to consider in respect of any policies, development or use of Tamaki Drive. The incorporation could extend to any future replacement of that Master Plan.

2. Tamaki Drive Design Guideline and Scenic Way references

The PAUP contains no acknowledgment of the past reports and the detailed studies which gave Tamaki Drive the status of “Scenic Way” in the ACC Operative District Plan. Instead of regarding the Drive as “a unique waterfront, a sequence of beaches and seaside villages which are a premier tourist attraction,” the Unitary Plan has taken a different approach, treating each apart as a distinct and separate entity, linked by a major road. Extracts are set out:

The District Plan states in 5B.3.2. **Human interaction**

At some parts of the coast, the combination of physical and built features add up to a distinctive landscape of much value to the City and the wider region. The Tamaki Drive waterfront edge has been identified as such a landscape because of its unique situation at the interface between the City and the Waitemata Harbour, the significance of this part of the coastline as a recreational resource and its importance as a transport route to the eastern suburbs. **The totality of the Tamaki Drive landscape forms a unique scenic way extending from Judge's Bay at its western end to Achilles Point in the east which warrants special consideration.[emphasis added]**

5B.7.1 “Any assessment of development in the Coastal Management Area within that area defined as the Tamaki Drive Scenic Way (refer Part PART 5C - HERITAGE) shall have, in addition particular regard to the provisions of Clause 5C.7.7 SCENIC WAY”

5C.7.7. is the section which describes the objectives, heritage values and the strategy for the protection of natural and physical resources of the Scenic Way. The protection measures include Coastal Management Area applied to all land with a direct relationship to the Eastern Bays coastline, Coastal Protection Yard which limits activity and development immediately adjoining the coast; the Tamaki Drive Cliffline Tree protection, special earthwork provisions and added matters for assessment of environmental effects of an application for resource consent.

The Tamaki Drive Auckland City Design Guideline No 2 (1992) explains in more detail the makeup of the Scenic Way.

Tamaki Drive is the maritime ‘front door threshold’ of Auckland...Tamaki Drive comprises a series of cliff promontories interspersed with bays. Like mixed beads on a string each buffers and emphasizes the uniqueness of the other and the Drive can be considered as a unified sequence of individual character areas.... p6

Landform. The current urban form and character of Tamaki Drive varies in an episodic manner, related to the landform sequence of built areas in the flat bay lands, interspersed with the cliff promontories of the truncated headlands. This modulation is a happy one which provides a varied user experience, offering a range of urban commercial centre/residential characters, separated by valuable open landscape areas between. Each centre thus maintains its individuality and identity; each area of open space natural landscape also potentially maintains its purity.

Like mixed beads on a string, each buffers and emphasizes the uniqueness of the other.

The Drive in total is all of these localities, and is experienced as more than just the sum.

The Tamaki Drive Design Guideline, Part 7 Landform and Physical Environment: p35-36

Decision requested

In addition to the primary recognition of the Tamaki Drive Master Plan, the Tamaki Drive Design Guideline No 2 issued by Auckland City Council 1992, and the **Scenic Way** references in the existing operative Auckland City Council District Plan, should be incorporated by direct reference or be named as a relevant document in respect of any development or use of Tamaki Drive.

3. Coastal Protection Yard and Coastal Protection Area –application to Tamaki Drive

The Coastal Protection Yard Policy 3.3.8.1 and overlay does not presently apply to Tamaki Drive, but has policies that are consistent with the Tamaki Drive Master Plan objectives.

PAUP does not include Tamaki Drive in the Coastal Management Area, nor in the Coastal Protection Yard. This control applies to the North Shore, and not to the Eastern Bays beaches. Environmental protection is given to the Significant Ecological Areas of the Paritai Reserve and the Glendowie Cliffs, and the Whenua Rangatira adjacent to Okahu Bay is recognized but the rest of Tamaki Drive is not. Thus the PAUP splits Tamaki Drive into segments, omits the status it was given in the ACC District Plan, and the protection which given in 1999 will be lost.

Currently, an application to reduce the width of the Coastal Protection Yard is assessed as a discretionary activity which will be notified if affected parties have not given written approval and/or if removal of a substantial tree or vegetated area is required, and there is probability of a material effect on the coastal marine area. 5B.7.2A. Cliffline protection at present extends 30m.

PAUP has different assessment criteria and development controls. The rule for Vegetation Management H.4.3.1 applies to 20m. Removal of a tree is a controlled activity, not discretionary. So is removal of trees in SEA for a building platform/ accessway. Otherwise it is Discretionary.

Decision requested

That the Coastal Protection Yard Policy 3.3.8.1 and overlay be applied to Tamaki Drive.

4. St Heliers character overlay

The submission supports the inclusion of references to Tamaki Drive, and in particular Part 5, Appendix 11 Precincts, 11.2.1, the St Heliers Character Overlay Approach.

Landscape

St Heliers Bay is the eastern-most bay of a repeated pattern of small beaches separated by headlands and cliffs, forming a scalloped profile along Tamaki Drive. The bay lies between the prominent Waitemata Sandstone cliffs at Ladies Bay to the east, and the headland to the west at Kohimarama. The town centre forms the seafront focus of St Heliers Bay and is orientated towards its coastal setting. .. Tamaki Drive stretches along the coastline, and the open space, harbour views form an important component of the character of the scenic entrance to the centre from the west... The public realm along Tamaki Drive is defined by the relationship between the urban and coastal edges of the street. The distinctive Moreton Bay fig trees, Vellenoweth Green and residential and commercial development on the southern side of Tamaki Drive complement the seaside character along the water's edge. The point at which St Heliers Bay Road and Tamaki Drive intersect creates a focal point for the village.

Tamaki Drive is the premier route for visitors and tourists to central Auckland to access the shore, a premier place for walking and cycling, yachting and boating, and a favoured events area, with outstanding views of the harbour and Rangitoto Island. Policies to maintain public access and the quality of the amenities for the public benefit must be given priority over any commercial activities.

Decision requested

An alternative to the relief sought in parts 1, 2, 3 above, if none are accepted, is that the concept of the St Heliers character overlay and references to the role of Tamaki Drive, should be applied to the whole of the connection of Tamaki Drive with Quay Street, Hobson Bay, Okahu Bay, Kelly Tarlton's aquarium, Mission Bay, and the Kohimarama waterfront.

5. Mission Bay and Kohimarama protection by a new character overlay

The St Heliers character overlay should be replicated to the other bays along Tamaki Drive that contain existing mixed commercial areas with similar development character. The Tamaki Drive Design Guideline identifies these character areas as including Mission Bay and Kohimarama.

Decision requested

The submission requests that the character of the commercial activities and protection of foreshore

and reserve amenities at Mission Bay and Kohimarama be recognised by a similar overlay as applied to St Heliers, but with modifications to assure continuation of the lower building height and density limits applicable to waterfront development in these locations. At Okahu Bay the joint management policies with Ngati Whatua remain applicable and sufficient to approve and manage activities.

6. Boardwalk along Tamaki Drive

The Tamaki Drive Master Plan endorses the concept of an improved vehicle carriageway, greater safety for cyclists in a dedicated cycle track, and a Boardwalk/ or wider promenade, to allow for safe pedestrian and enhanced recreational opportunities. In view of continuing increased use of the Drive and demands on the sea side amenities, the submission supports widening of the carriageway and construction of a boardwalk and promenades on the northern seawall side (from Mechanics Bay through to St Heliers). The Boardwalk/promenade is a key move in the TDMP p 26, “ provide more space for a widened seaward promenade (and promontories) to create a safe, family-friendly route for walking and cycling, and to improve connexions to the Hauraki Gulf.” To achieve these improvements it may be desirable for the PAUP to designate an additional corridor along the northern boundary of Tamaki Drive now or at a future date.

Relief requested

The submission requests that if the Tamaki Drive Master Plan is not incorporated in the Unitary Plan, that the PAUP be amended to specifically support the concept and place of a Tamaki Drive Boardwalk/ promenade.

7. Pohutukawa trees protection

The Orakei Ecological Restoration Priorities Report (January 2013) to the Orakei Local Board on p 5 states that “Coastal development has led to a decline in areas of natural coastal vegetation, particularly coastal cliffs dominated by pohutukawa. ...Any remaining areas are therefore ecologically significant, particularly when they form part of a corridor as at Paritai Reserve. TDPS submits that all the remaining coastal vegetation is important as a visual amenity and as defining the city edge both for residents, and for tourists and visitors arriving by sea or plane. None of the pohutukawa trees on private property along Tamaki Drive appear to have been listed for protection.

Further information see Appendix 1

Decision requested

That the PAUP expand the criteria for Groups of trees to include coastal cliffline pohutukawa for their ecological value and make appropriate additions to the List of significant specimens in the Schedule of Notable Trees.

8. Prohibit or Restrict Commercial Billboards along Tamaki Drive

Tamaki Drive Guidelines, p 24 states “Any proposed obstruction, including any public utility, building, structure or sign, located between the seawards kerb of Tamaki Drive carriageway and the harbor must not compromise harbor views and the visual qualities of the Drive as outlined in these Guidelines.”

p 29, 5.9, “Permit no commercial signage, or product advertising beyond street frontages (including verandahs) to commercially zones areas at local centres; and strongly constrain all signage (including sponsorship and non-commercial) in the whole corridor so as to maintain the visual clarity of its unique scenic and environmental character.”

Decision requested

In Character Defined Areas, and in Public Open Space along or visible from Tamaki Drive, and on the seaward side of Tamaki Drive, the policies stated above should be incorporated into the PAUP. Any significant billboard proposals under the plan should require a discretionary application consent. Any existing commercial or sponsorship signs should enhance the amenities of the area. Sponsorship signs should focus on promotion of the sport, and not on the sponsor's products or services.

9. Hauraki Gulf Marine Park Act 2000

The Unitary Plan should note more fully that the coastal area includes Tamaki Drive, and that the purposes of the Act will apply. **Section 8** recognises the national significance of the Hauraki Gulf, its islands, and catchments. The Act defines coastal area as: those areas of land (other than islands) that contribute to the distinctive character of the coast, including, but not limited to,—(a) land providing access to coastal water; or (b) land containing an uninterrupted ecological sequence of habitats and vegetation; or (c) land with historic features related to the coast.

The purposes of the Hauraki Gulf Marine Park, s 32, are—

(a) to recognise and protect in perpetuity the international and national significance of the land and the natural and historic resources within the Park:

(b) to protect in perpetuity and for the benefit, use, and enjoyment of the people and communities of the Gulf and New Zealand, the natural and historic resources of the Park including scenery, ecological systems, or natural features that are so beautiful, unique, or scientifically important to be of national significance, for their intrinsic worth:

(c) to recognise and have particular regard to the historic, traditional, cultural, and spiritual relationship of tangata whenua with the Hauraki Gulf, its islands and coastal areas, and the natural and historic resources of the Park:

(d) to sustain the life-supporting capacity of the soil, air, water, and ecosystems of the Gulf in the Park.

The Preamble (6) to the Act states that “People use the Gulf for recreation and for the sustenance of human health, well-being, and spirit. The natural amenity of the Gulf provides a sense of belonging for many New Zealanders and for them it is an essential touchstone with nature, the natural world, and the marine environment of an island nation.”

For Aucklanders and especially Eastern Suburbs residents, Tamaki Drive offers this touchstone.

Decision requested

That in the parts of the PAUP that recognise the HGMPA, the scope of the Act and its application to Tamaki Drive should be identified. In recognising the application of the Tamaki Drive Master Plan under the PAUP, a similar acknowledgement should be included as to the relevance of the HGMPA to policy, plans and development.

Appendix 1

Ecological reasons for additional protection of cliffline pohutukawa.

- a) The Orakei Ecological Restoration Priorities Report (January 2013) to the Orakei Local Board on p 5 states that “Coastal development has led to a decline in areas of natural coastal vegetation, particularly coastal cliffs dominated by pohutukawa. ...Any remaining areas are therefore ecologically significant, particularly when they form part of a corridor (e.g.Paritai Reserve.) TDPS submits that all the remaining coastal vegetation is important as a visual amenity and as defining the city edge both for residents, and for tourists and visitors arriving by sea or plane.
- b) **Cultural.** Maori regard pohutukawa as a sacred tree one of rakau rangatira (chiefly trees) featuring prominently in their history & legends.
- c) **Scarcity.** An extensive survey *Auckland Protection Strategy, a report to the Nature Heritage Fund Committee*, 2009 has been carried out, which divides the Auckland Council area into ecological districts. Auckland City, the North Shore, Auckland Isthmus and South Auckland occupy the Tamaki Ecological District. *Auckland Protection Strategy* p 35. The study identifies that only 20% of the remaining native vegetation remnants in the Tamaki ED are in protected areas. Of particular concern is the fact that only 309 ha remain of the original 15556 ha of coastal forest, and of this only 190 ha has protected status.
- d) **Adapted to cliffs.** Pohutukawa dominates the most exposed rocky outcrops and headlands where few other large woody species are able to withstand the severe coastal conditions. Pohutukawa (*Metrosideros excelsa*) is a multi stemmed tree up to 25 m high found mainly along the coastal fringe, often on rocky cliffs. It once formed an almost continuous belt of forest around NZ’s northern coasts. According to *Pohutukawa. Ecology, Establishment, Growth and Management*, David Bergin and Gordon Hosking Project Crimson, 2006, p 4. “ Loss of much of NZ’S pohutukawa forest means that exceptionally large specimens are uncommon.” p8.

An extensive survey *Auckland Protection Strategy, a report to the Nature Heritage Fund Committee*, 2009 has been carried out, which divides the Auckland Council area into ecological districts. Auckland City, the North Shore, Auckland Isthmus and South Auckland occupy the Tamaki Ecological District. *Auckland Protection Strategy* p 35. The study identifies that only 20% of the remaining native vegetation remnants in the Tamaki ED are in protected areas. Of particular concern is the fact that only 309 ha remain of the original 15556 ha of coastal forest, and of this only 190 ha has protected status.

Pohutukawa dominates the most exposed rocky outcrops and headlands where few other large woody species are able to withstand the severe coastal conditions. Tree stability: Pohutukawa trees are usually windfirm even though often inhabiting very exposed sites. Breakages are relatively uncommon, due to the strength of the wood and ability of branches, roots & canopy to conform with the features of the environment, according to the report: *Pohutukawa. Ecology, Establishment, Growth and Management* p31.

The authors report that while large sprawling branches which extend outwards from the cliff top to which they are anchored may appear precarious, in reality they are firmly anchored by their roots to the substrate. “The branches are able to bend or rotate over the cliff edge for decades or even hundreds of years, without breaking.” *Pohutukawa. Ecology, Establishment, Growth and Management* p33-34.

2. Conservation issues: POHUTUKAWA AND BIODIVERSITY

“The value of the concept of biodiversity is that the many aspects of conservation are brought under a single canopy. Biodiversity includes understanding a species in all regards - its uniqueness, biogeography, structural characteristics and its ecological and cultural attributes. Biodiversity also deals with the ecosystem to which a species belongs and the processes operating within the ecosystem that facilitate interactions and ecological health. Finally, biodiversity includes the relationship of a species to people, the particular values or uses as individuals, as an ecosystem or a landscape; and, of course, management based on the problems the species is facing.

The holistic concept of biodiversity can obviously be used to understand and manage pohutukawa. This famous New Zealand tree has become known for its character as an individual more than for its role in the coastal forest ecosystem, and this probably underlies the urgent need to improve our management of it. Project Crimson, a sponsorship programme for conserving pohutukawa, is a reflection of this need, and one of its objectives is to increase public awareness of pohutukawa. The concept of biodiversity is valuable as a means of education too. The concept can be applied to the conservation of pohutukawa and help build on the awareness that Project Crimson is fostering.”

In his book "Vegetation of New Zealand", Peter Wardle writes: "Pohutukawa is superbly adapted to northern coastal cliffs ... The light seed can blow into any crevice, and the roots spread widely over rock faces, seeking fissures and pockets of soil. The canopy moulds to the wind and tolerates salt spray, and aerial roots descend from the trunks to provide further

anchorage...the leaves are well protected against drought. When young, the leaves are coated with soft hairs. As the leaves age, the upper surface forms a tough, shiny coat of wax and the hairs rub off. The underside of the leaf, however, retains a thin coat of felt, as protection against excessive water loss.

The wood of pohutukawa is a dark-red-brown, and is hard and heavy. Its strength has enabled the spreading habit of the branches to evolve as a means of protection against the damaging effect of coastal wind and to spread the weight of the crown when growing over unstable rocky slopes.

Graeme Platt (1991) describes the tall, upright growth of some pohutukawa at Rotorua Lakes, and perhaps these could represent the evolution of a new adaptive non-coastal form. Unlike its Pacific relatives, pohutukawa trees can be very old, perhaps even up to 1000 years old. To survive for this period of time in the rugged landscape of the New Zealand coast, every feature of the anatomy and physiology has to be extremely well adapted.

The Pohutukawa Forest

The longevity of pohutukawa is surprising given its ecology as a coloniser of bare, coastal rock. Not only do few other trees grow in such places, but constant erosion, storms and regular drought create an unstable environment. This suggests that pohutukawa serves an ecological "purpose" on the front line.

Pohutukawa establishes in a crevice and grows to dominate the physical environment for hundreds of years. Beneath it and behind it, the pohutukawa create a more gentle environment able to be colonised by a broader range of species. This quality is also a feature of some of its close relatives like the ohia lehua (*M. polymorpha*) of Hawaii: they colonise bare lava too, but they are relatively short-lived and die out to reveal an understorey of tree ferns and numerous other types of tree that they have enabled to grow by creating a soil on bare rock. Pohutukawa forest is New Zealand's most distinctive coastal forest type because it is often dominated by a single tree species.

The spreading canopy forms a dense continuous layer that few other trees can penetrate. Rangitoto Island is a good example, where only a few rewarewa emerge. Pohutukawa forest is extremely rare nowadays; estimates by Gordon Hosking of the Forest Research Institute suggest that over 95% has been destroyed by farming, roading and urban development. It is seen at its best on offshore islands like the Poor Knights, the surface of which can be a "carpet" of crimson when all the trees are in flower together.

Philip G. Simpson (1994), Science and Research Division,
Department of Conservation, Wellington

Pohutukawa belongs to the genus *Metrosideros* or "iron-hearted myrtles". John Dawson, a specialist in the genus, suggests that there are two subgenera - the trees, and the vines, that together number nearly 50 species in the Pacific Islands (the trees), and the continental rim lands of the western Pacific (the vines). New Zealand and New Caledonia are centres of diversity for both groups (Dawson, pers. comm.; Dawson, 1988). The ancestor probably occupied the mobile islands of the SW Pacific in early Tertiary time (the Paleocene, 65-55 million years ago) perhaps colonising the volcanic or sedimentary rocks as they emerged from the sea. This ability is still common to the Pacific species like Hawaii's ohia lehua, New Zealand's Kermadec Island "pohutukawa", and pohutukawa itself. But the ancestor has given rise also to modern species that have gone beyond the coastlines and entered the great forests of Aotearoa, creating towering trees and forest lianes. "New Zealand" has been important, therefore, in both the origin and diversification of *Metrosideros*.

One of the unique characteristics of the *Metrosideros*, that helped it colonize bare rock, is the ability to form roots from the branches. The Kermadec Island species forms great clonal masses as collapsing trees root and regrow. Pohutukawa itself forms large aerial root masses, and the branches of trees can root when they bend down to touch the ground. The same ability has been specialised in rata to form "claspings" or "girdling" roots that attach the epiphytic seedling to the trunk of an existing tree, and eventually grow so huge as to coalesce around and "strangle" the host tree and creating a pseudo-trunk of its own. More delicately the stems of climbing species send out roots that cling to other plants and eventually enable the vine to form large lianes with stems descending from the forest canopy to the forest floor. So, using the ability of the ancestor to form roots into bare rock, the iron-hearted myrtles of New Zealand have radiated through the forests of Tane from the subtropical to the subantarctic, from the coast to bushline.

Pohutukawa grows along the coastal fringe - the very place that New Zealanders and tourists like to be...For the most part the ecological processes that have operated for millions of years, crafting a finely adapted living edge to the land, have been disrupted. A prison of geriatric trees has replaced a dynamic ecosystem. (<http://www.nzhistory.net.nz>)

3. Risks to trees

a. Cliff edge Developments and Excavation Development close to the cliff edge, lack of understanding that pohutukawa do not exacerbate cliff erosion but rather they prevent or mitigate it, and a desire for uninterrupted sea views contribute to the loss of pohutukawa from high profile sites. *Pohutukawa. Ecology, Establishment, Growth and Management* p 81. (see photos p 81 and 85).Excavation disturbs soil and severs or damages tree roots that hold the soil in a strong network. Drainage channelled over cliffs can trigger slips and erosion during heavy storms. Landowners then seek protection by seawalls and coastal structures but the ARC Coastal Plan and Coastal Erosion Manual 2000 advocates non-structural management where practical; planting rather than hard structures.

b. Erosion control. An Eastern Bay of Plenty survey of 63 slips in 150m of coastline found after an exceptional rain event, that vegetation cover **in disturbed areas** was dominated by grass, gorse, pampas and wattle. **In adjacent undisturbed areas** the vegetation cover was predominantly pohutukawa. Slips originating at the top of a cliff were invariably associated with modifications of land use, or interference with vegetation cover. (p85)

4. Current Cliffline Protection: The Operative District Plan: Part 5B 3.2 District Plan :

landscape

The coastal cliffs are subject to the natural processes of erosion. While the fundamental cause of this process is the interaction of natural agents of erosion in the coastal environment such as wind and wave action, the actions and activities of man can modify the process of erosion. For example, active erosion by the sea of the sandstone cliffs along Tamaki Drive is now prevented by the impoundment of those cliffs by the Drive itself. Conversely, active removal of vegetation at some locations and careless surface drainage of residentially crowded cliff tops has accelerated the disintegration of cliff edges and led to slipping. The Plan must ensure that activities occurring within the Coastal Management Area do not lead to erosion of these coastal cliffs.

In addition to their geological significance, these cliffs from imposing headlands at several locations along both harbours which provide unique coastal views as well as forming significant landmarks in their own right. The existence of some of the oldest and most mature stands of coastal native bush, dating back several hundred years, adds to this landmark significance. Only a fraction of that original forest cover remains today in the form of small and fragmented stands of pohutukawa on the cliffs at Hillsborough, Pt. Chevalier, Cox's Bay, Herne Bay, St Mary's Bay, Tamaki Drive, Glendowie and the lower reaches of the Tamaki Estuary. The Plan must ensure that the activities occurring within the Coastal Management Area are undertaken in a manner that ensures the retention and protection of the remaining coastal bush, particularly any established pohutukawa trees.

"5B.7.2B **The following tree protection rule shall apply in the areas defined below**, except where permission has been granted.

i) No person shall cut, damage, alter, injure, destroy or partially destroy:

(a) any indigenous tree or vegetation;

(b) any exotic tree greater than 6m in height or 600mm in girth (measured at 500mm above ground level).

The Council may grant an application for a discretionary activity resource consent to remove or pollard such vegetation or trees, or any substantial part thereof if it is satisfied that such consent is justified by circumstances which include dangerous, diseased, or damaged conditions, compliance with any statutory or legal obligation or hardship, or any other cogent reason. Consent will not be granted where an improvement in view is sought unless the Council is satisfied that the natural character, of the coastal environment, the ecological amenity of the site and the health of the tree will not be affected.

St Marys Bay to Coxs Bay Cliffline

20m either side of the seaward boundary of those sites situated along the original cliff face and shoreline of St Marys Bay and the Herne Bay foreshore between the Harbour Bridge off-ramp (to Ponsonby) and the eastern boundary of the site at 16 Harbour Street, and from the western side of Curran Street to the point where West End Road first abuts Coxs Bay. This area is identified on the Planning Maps.

Tamaki Drive Cliffline

30m inland from the seaward boundary of the sites adjacent to Tamaki Drive, as identified on the Planning Maps.

Glendowie Cliffline

30 metres landward from the mean high water spring tide mark as identified on the Planning Maps.

Parnell Cliffline

30 metres landward from the mean high water spring tide mark as identified on the Planning Maps.

Hillsborough Cliffline

30 metres landward from the mean high water spring tide mark as identified on the Planning Maps.

Coxs Bay to Pt Chevalier Cliffline

30 metres landward from the mean high water spring tide mark as identified on the Planning Maps.

Explanation

The coast is an environmentally and visually sensitive interface between the land and the sea. Any development which takes place in close proximity to the foreshore has potential to impact on visual amenity and on marine ecosystems. The imposition of a Coastal Protection Yard with strict limits on activities which can take place within that yard, ensures that the environmental and visual values of the coastal edge are conserved.

Mature trees and indigenous vegetation particularly pohutukawa, are an integral part of the coastal landscape of the City. Those which line the coastal cliffs have an important role in maintaining the stability of those cliffs and in reducing erosion. They also make a significant contribution to the visual amenity of these landforms. Therefore removal of indigenous vegetation or mature trees within the

Coastal Protection Yard is strictly controlled in order to maintain the visual amenity of the coastline and, in certain locations, reduce the risk of erosion."

Date 13 December 2013