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SUBMISSION ON PUBLICLY NOTIFIED

WELLINGTON REGIONAL PLAN REVIEW 2012

RESOURCE MANAGEMENT ACT 1991

To: WELLINGTON REGIONAL COUNCIL

ATTEN: RPS POLICY GROUP

WELLINGTON REGIONAL COUNCIL

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Introduction

This is a submission from **Surfbreak Protection Society Incorporated** ("SPS") on the **Proposed Wellington Regional Plan Review (PWRPR)**

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 eco systems 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.

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 coastline, with our purpose of protecting surf breaks now mandated by national policy direction in the NZCPS (and by regional policy direction, for example, in the Taranaki Regional Policy Statement 2009).

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 coastline².

Approximately 7% [310,000] of New Zealanders are estimated to "surf" on a regular basis³. 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

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.

² 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."

³ Figures sourced from SPARC

of Part 2 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.

Background into this submission

The Surfbreak Protection Society is a nationally representative body that strives to engage territorial authorities in the conservation and protection of naturally occurring surfbreaks.

Our Society put a great deal of effort into the NZCPS that was released on 3rd December 2010.

The initial round of Community engagement conducted in 2010 regarding the proposed Wellington Regional Plan, was before the release of the New Zealand Coastal Policy Statement on the 3rd December 2010. At the time, SPS was not geared for this earlier round of consultation regarding the Proposed Wellington Regional Plan.

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 the purpose of Regional Policy Statements' (RPS) (section 59).

Section 59 Purpose of regional policy statements

The purpose of a RPS is to achieve the purpose of the RMA by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region.

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 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” of people and communities by providing for the recreation activities of surf-riders, but also have wider benefits in terms of the economic activity of the local area 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.

There are several places in the Wellington 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 Wellington region contribute to the character and attractiveness 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 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: ...

The matters of national importance in section 6(a), (b) and (d) are relevant to the consideration of surf breaks because breaks are natural features and their use depends on public access to the coastal marine area. Surf breaks are an element of natural character in that they rely on the natural formation of swell corridors and reefs, bars, headlands, ledges or beaches for a wave to break.



Lyall Bay 8-9 December 2012

Regionally, Nationally and internationally numerous surf breaks have been modified by coastal engineering activities, (e.g The Corner car park and Airport Wall at Lyall Bay) but they still contain a degree of natural character. The nature of the surfing experience is also affected by the natural character of the surrounding area.



Titahi Bay

In some places, the lack of built elements adds a remote, wilderness value to the surfing experience (e.g. White Rock - Ning Nong). At breaks in more developed areas, the natural elements of cliffs and vegetation along the coast contribute to this (e.g. Houghton Bay). In some places, surf breaks will also be an outstanding natural feature or part of an outstanding natural landscape (e.g. the Gap at Castlepoint lagoon).



("The Gap" surfbreak at Castlepoint)

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 subdivision 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—

(c) the maintenance and enhancement of amenity value⁴: ...

(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 often provide a major element contributing toward the amenity value of an area. This is because they provide for the recreation of those people surfing, the pleasantness of a site, and for the enjoyment of people in a community (as well as visitors to a community) who watch surfers and waves from the land.

Therefore, maintenance and enhancement of the quality of the environment is important for retaining the significance of the surfing experience and these community values. Surf breaks are a finite characteristic of the environment as they only occur at specific sites. As features they are reliant on a number of natural processes. They can easily become vulnerable when

⁴ RMA Section 2 (Interpretation) - 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.

these processes (which create the break) are disrupted. To date there is no reasonable technology to replicate the natural processes of a surf break, nor is there any feasible technology to replace a natural surf break.

Surf breaks are a relevant matter for inclusion in the PWRPS as the maintenance of their values depends on the integrated management of activities both in the coastal marine area (CMA) and on the adjacent land. Activities in the CMA, such as dredging, can affect the processes which result in surfable waves forming, while water quality and discharges can affect the quality and safety of the surfing experience. Activities on land, such as development and vegetation clearance, can affect the nature of the surfing experience and the access to surfing locations. Land based sources of contamination (sediment, nutrients, pathogens) can also affect the use of a surf break.

Maintenance of the coastal environment is a significant issue for the Wellington region because of the high levels of use of the coastal areas, and the importance the community place on the coast. Surf breaks are an important element of the region's coastal environment for many people and warrant specific consideration in the resource management of the region.

Recognition of surf breaks in planning processes

There is considerable evidence internationally that surf breaks can be altered or destroyed by coastal development. Surf breaks can be destroyed by large scale works, such as an LPG terminal in Mexico. The quality of a break can be affected by smaller works such as construction of seawalls (eg St Clair, Dunedin, (the Corner – wall and car park at Lyall Bay), jetties (eg Mission Bay, San Diego, California), boat ramps (eg Manu Bay, Raglan), piers (eg Oil Piers, Ventura, California) and beach nourishment (eg The Cove, Sandy Hook, New Jersey).

In the case of Mundaka, a Spanish venue for World Tour Championship competitions, the 2005 event was cancelled due to a lack of wave quality blamed on increased dredging and dumping of sand in the adjacent harbour. Any modifications to surfing break's needs to be strategic and not by chance to avoid accidentally destroying or degrading the surf break resource. In New Zealand, concerns about potential effects on surf breaks have been advanced including recent concerns on sand mining at Pakiri and Mangawhai area.

Surfers' concerns regarding the quality of the surfing experience have contributed to community pressure for upgrades to wastewater discharges in Whangamata, Raglan, Gisborne, Dunedin and Wellington. Such issues have demonstrated the depth of community concern about surf breaks and potential adverse effects from activities in the CMA or on nearby land. Decisions made at the PWRPS planning level could facilitate more expedient outcomes when such conflicts arise.

It is expected that the number of people participating in surfing will grow as the regional population grows. At the same time, there will be pressure for increased development and works along the coast in response to demands for other activities or in response to the effects of climate change.

The PWRPS is an important means of requiring such consideration as it can influence planning for the land and the coastal marine area, and guide decision making in resource consents and other processes.

A variety of factors need to be addressed in a policy on surf breaks. These include:

- access to the surf break



- water quality of the surf breaks



- integrated consideration of potential effects on the physical processes that form a surf break .



(the Car park at the Lyall Bay Corner was not notified to the local surfing community although that was the reason why it was built. The car park seawall has also had an adverse effect on wave quality)

Consequently, the policy needs to cover the wider swell corridor and seabed, adjacent land and facilities, as well as the area of the surf break itself.

It is important to retain the existing variety of surf break types in the region to encompass a range of surfing skill levels and provide variety in the spectrum of surfing opportunities. There is a gradient in skill level that needs to be provided for so that beginner to advanced surfers can be accommodated.

It would be inappropriate to only protect surf breaks of the highest quality or skill level, or only those in highly natural settings or those closest to the urban area. Such attributes should be considered in any assessment of effects but it is preferable at the more strategic (PWRPS) level to identify a variety of surf break types and to provide information on the particular values of the different venues or sites.

Explicit inclusion of surf breaks in the PWRPS will provide regional direction on the need to consider the breaks in RMA decision making. The policy will be implemented through the regional coastal plan, district plans and resource consents. It is not intended that the policy will stop all future development in the proximity of surf breaks but to ensure that adequate regard is given to potential effects.

Recognition of the surfbreaks as an important part of the region's coastal environment will reinforce the need to consider whether new developments will enhance or adversely affect the values of the surf breaks and coastal spaces.

The New Zealand Coastal Policy Statement 2010

The New Zealand Coastal Policy Statement came into effect on the 3rd December 2010 after much lobbying and consultation with surfing groups like SPS. The NZCPS recognises the important amenity value of surfbreaks and the unique geological / morphological components that create them. The NZCPS acknowledges with the following policies and identifiers:

NZCPS 2010 Policy 16 – Surf breaks of national significance

There was a significant response from surfers and surfing organisations to the review of the NZCPS in 2008 by the Minister of Conservation. This resulted in Policy 16 “**Surf breaks of national significance**” in the NZCPS, which states:

Protect the surf breaks⁵ of national significance for surfing listed in Schedule 1, by:

- (a) ensuring that activities in the coastal environment do not adversely affect the surf breaks; and*
- (b) avoiding adverse effects of other activities on access to, and use and enjoyment of the surf breaks.*

There were some key note changes made through the development of Policy 16 from what was originally drafted with policy 20 in the Proposed NZCPS 2008. This resulted from submissions that SPS and others put to the Board of Inquiry (“BOI”) to ensure surf breaks were to be adequately provided for. These are issues that need to be considered by Wellington Regional Council in providing for surf breaks in the proposal.

First, the breaks identified in above mentioned policy 20 [now refined as Policy 16 NZCPS] appeared unfounded and required rationalisation. In the absence of any established criteria, the ‘Wavetrack method⁶’ was accepted as a suitable proxy for identifying nationally significant breaks. However, an established methodical approach to the identification and management of surf breaks is required. This is supported in the BOI recommendations, which states:

We conclude that there should be no criteria in the (NZCPS) policy for selecting further surf breaks of national significance given that there could be developments in the methodology in identifying and rating natural surf breaks. For example, we note the strong plea by many submitters for ensuring diversity of surf breaks so that all surfing skill levels are provided for. (DoC 2009b)

⁵ ‘Surf break’ is defined in the Glossary of the NZCPS: “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.”

⁶ All breaks with a rating of 10 out of 10 on the ‘Stoke Meter’ in the ‘[Wavetrack New Zealand Surfing Guide](#)’ (supra) were scheduled for protection under Policy 16. The guide identifies 16 of the 470 listed breaks, as having a 10 out of 10 ‘stoke’ or surf quality rating. This was accepted by the BOI as the most authoritative guide to New Zealand surf breaks. The surf break of Papatowai is included as an exception to the Wavetrack method that was protected for its growing international profile as a high performance big wave break. 17 surf breaks were scheduled in total.

Secondly, surf break protection must cover the coastal environment, and not be restricted to the confines of the CMA. This is because activities beyond the CMA can potentially effect surf breaks such as land based discharges effecting water quality and sedimentation, and restriction of public access to a break. These are issues that need to be provided by land use controls in Regional and District Plans, as well as using management areas in Regional Coastal plans. Therefore the OWRPS is the appropriate tool for providing this necessary guidance in applying principles of Policy 16.

Thirdly, the 'remedying and mitigating' of effects on surf breaks is not considered practicable. While the technology for developing artificial surfing reefs is just in its infancy, it is still not feasible to replace the values provided by a natural break. Hence the change to 'avoiding' made by the BOI when drafting Policy 16. Therefore, in developing policy for the PWRPS, SPS submits that avoidance from inappropriate subdivision, use and development in the coastal environment is the only measure as per the requirements of Policy 16 for surf breaks of national significance

NZCPS 2010 Policy 13 - Preservation of natural character

Due to the nature of the surf breaks listed for protection in Schedule 1 and identified in Policy 16 NZCPS, the NZCPS essentially protects the 'best of the best' of our high performance waves in New Zealand. However, the NZCPS has made provision in Policy 13 "Preservation of natural character", to provide for the comments made by the BOI in relation to ensuring a diversity, of representative range, of breaks are protected.

This is where the proposal, RPS's generally, and other planning documents are required to take direction from. We submit that second generation RPSs are planning tools to further develop criteria and methods for managing representative types of surfing breaks for regions, considering aspects of the surfing experience such as the wave breaking type, height range, geology, and skill levels required. Policy 13 in the NZCPS states (emphasis added below):

Policy 13 in the NZCPS states:

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.

This policy recognises that surf breaks form part of the natural character of the coastal environment. This provides the framework for the proposal to include surf breaks within it. In achieving the purposes of, and giving effect to Policy 13, it should also be restated that the

preservation of the natural character of the coastal environment is a matter of national importance within section 6(a) of the RMA:

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....*

The matters listed in Policy 13 NZCPS 2010 also include factors that contribute to the quality and integrity of the natural processes that create a surf break, such as 'the natural movement of water and sediment'. This is also supported in the BOI working papers in the statement as follows:

The quality of the wave can potentially be compromised by developments in the swell corridor seaward of the break, and the enjoyment of surf breaks by surfers compromised by discharges, limitations on access, and changes to natural character. (DoC 2009b)

The NZCPS 2010 provides a definition of 'surf break'⁷ which is important to include in the OWRPS policy.

Definition of Surfbreaks in the NZCPS 2010 Glossary

The definition provided in NZCPS 2010 in the glossary is :

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.

⁷ Supra

‘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 maintains that the definition of a surf break covers a large spatial extent, far beyond the location of wave riding. The swell corridor of a surfing break can extend far out to sea (beyond the 12 nautical mile mark), and activities such as aquaculture, dredge spoil disposal and wave energy infrastructure at certain scales could block or modify waves traveling through the swell corridor.

It is SPS’s submission that surfing breaks should be managed through developed spatial planning techniques, including policies and methods in PWRPSs, as well as policy methods (including rules) in Regional Coastal plan, Regional Plans, and District Plans. Without spatially allocated coastal marine zones that have controls over activities using rules, the consenting process will be required to make ad hoc consenting decisions. SPS maintain that these decisions should be made at a strategic level in plans where possible.

It is considered preferable to explicitly recognise surf breaks within policies rather than only in explanations and background sections of an RPS. Using only explanations continues the approach of relying on consideration of general values such as natural character and water quality that are important throughout the coast. Such values are important at surf breaks, but the break should also be recognised as a relatively unique location where natural processes create an important recreational resource that has social and economic benefits for the wider community (ARC 2010).

With the advent of the new NZCPS recognising surf breaks and many RPSs and various plans going into their second generation, there is a need to establish a methodical approach towards this identification.

This need has been recognised by Gisborne District Council and the Bay of Plenty Regional Council (BOPRC) who employed a summer student (Bailey Perryman) to assist in developing criteria for surf break identification and developing appropriate policy and plan responses. The intention of this work is to potentially feed into these regions policy and for information sharing to guide other Councils on robust policy approaches. SPS have

supported the student by awarding him the inaugural SPS Surfbreak Preservation and Sustainability grant.

The project draws on existing work and knowledge from experts in the field of surf break protection, while involving consultation with surfing communities and industry members. The project will identify the different values associated with breaks through consultation with local surfers, a variety of community interest groups and tangata whenua which can then be used by other local authorities for doing so. From this research the social, economic and cultural factors that contribute to surf breaks can be adequately identified by the community so that the breaks deemed most appropriate for preservation and sustainability are identified. From here natural and physical features which make up different breaks can be identified for management purposes.

Methodology for surf break identification

Local authorities are tasked with ensuring sustainable management of any potential conflict between different uses within limited coastal spaces and the coastal environment. This is to meet the reasonably foreseeable needs of future generations while avoiding, remedying or mitigating any adverse effects of these activities on the environment. In the particular case of Policy 16 in the NZCPS; the requirement is to 'avoid' adverse effects on access to, use and enjoyment of the surf breaks.

The working papers for the BOI's recommendation to the Minister of Conservation also support further investigation into New Zealand's surf breaks through RPSs, coastal and district plans, which states:

We agree that the matters of national importance – particularly preserving the natural character of the coastal environment and outstanding natural features from inappropriate subdivision, use and development - involves more than protecting surf breaks of national significance. Surf breaks not identified and protected as nationally significant under policy 20 [now 16] are also likely to require consideration under other policies, such as natural character, outstanding natural features and landscapes, public open space and public access. (DoC 2009a)

There have been some recent developments around criteria for identifying the different values of surf breaks. This has introduced the concept of applying a more biological sense to

the identification of surf breaks. This is also briefly outlined to the BOI in the evidence given during the combined SPS submission effort⁸.

There is a combination of factors applicable for determining the level of significance attributed to a surf break and the values the surfing break possess. These include: rarity, representativeness, quality (stoke rating), nature of use – i.e. nursery break/contests/popular town beach, cultural heritage, local social and economic significance and associated activities (ARC 2010).

While this may be baseline for determining some factors, it is preferable that clear criteria is based on solid community participation to be developed to determine other factors.

The protection of the natural character of the coastal environment implies that sufficiently representative breaks in their natural context should be protected. This requires an understanding of the diversity of breaks to ensure that representation is complete.

Preservation and sustainability of a representative range of values and “surfing nurseries”

Surf breaks are finite natural resources that contribute to the social, environmental, economic and cultural wellbeing of people and communities.

Surfers rely on surf breaks to recreate. Not only this, but they also have wider benefits in terms of the economic activity of the local area and creation of a distinctive ‘sense of place’ and identity for communities close to surf breaks. International research demonstrates that surfing breaks can have significant social and economic values⁹. This was also recognised by the BOI, which stated:

The economic value of surfing to tourism and the social benefits should not be underestimated. (DoC 2009a)

The need for ‘protection in order to preserve’ was addressed by SPS in evidence given to the BOI¹⁰. Surf breaks are finite and vulnerable geographical features that help constitute the natural character of the coastal environment. Increasing pressures in the life of the

⁸ See evidence of Hamish Rennie, retrieved October 20, 2010 from <http://www.doc.govt.nz/upload/documents/getting-involved/consultations/current-consultations/nzcps/evidence/133-nzcps-evidence-7-7.pdf>

⁹ Lazarow *et al.* 2007; Nelsen *et al.* 2007

¹⁰ See evidence of Hamish Rennie, retrieved October 20, 2010 from <http://www.doc.govt.nz/upload/documents/getting-involved/consultations/current-consultations/nzcps/evidence/133-nzcps-evidence-7-7.pdf>

NZCPS may lead to damage and destruction of surf breaks. Therefore a level of protection is required if the natural character of the coastline is to be preserved as well as maintaining and enhancing amenity values and the quality of the environment¹¹ generally.

For surfers, protecting surf breaks that foster surfing communities and cater for all levels of ability is required to provide for their social, economic and cultural wellbeing, as well as sustaining the needs of future generations. 'Nursery' breaks have high recreation value for a variety of reasons. They are frequented by surfers of all levels, whereas the NZCPS breaks are mainly advanced level breaks. For example, a locally or regionally significant break could include popular town beaches or 'consistent' surf breaks suitable for holding contests.

It is important to protect a variety of surf break types in the region that cater for a range of surfing skill levels and provide variety in the spectrum of surfing opportunities. This is to ensure the values of the surfing experience and its enjoyment can be maintained all the way through from beginner level to the advanced. It would be inappropriate to only protect surf breaks of the highest quality or skill level, or only those in highly natural settings or those closest to the urban area.

Such attributes should be considered in any assessment of effects. Therefore it is preferable at PWRPS level to provide for regionally significant surf breaks. This will provide for the recognition of the diversity of surf breaks inherent to the region, and allow for policy and methods that will direct management for the variety of values that exist at different sites.

Surfing breaks as a geographical feature and landform

The natural character and landscape of an area includes surf breaks. This does not mean that surf breaks should only be considered in the context of their contribution to natural character. They are also a transiently legible part of the seascape, which includes the geological, topographical and hydrodynamic components. These components are specifically reflected in Policy 15 of the NZCPS 2010.

Policy 15 of the NZCPS 2010 states:

“Natural features and natural landscapes” (emphasis added in bold below):

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

¹¹ As defined in section 2 RMA

-
- (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.*

Seascapes are not simply the bit of water bounded by land, nor are outstanding features simply those that are permanently above water or on dry land. Consequently the recognition, protection of surf breaks as features in themselves or as features within landscape/seascape needs to be facilitated during the PWRPS.

Monitoring of surf breaks

Monitoring of the nationally and regionally significant surf breaks and seascapes will need to be undertaken to give assurance of adequate protection. There is justification for the consideration of surf breaks in strategic planning and in baseline environmental monitoring. This also applies to the one-off assessments of environmental effects for particular developments in applications for resource consents near a surf break, all of which is due to the NZCPS. The PWRPS is an important means of requiring such consideration as it can influence planning for the land and the coastal marine area, and guide decision making in resource consents and other processes.

Developing a robust policy approach

The former Auckland Regional Council carried out background work on surf break policy, which can be used for guidance and which SPS adopts for the purposes of these submissions in the context of these submissions and in the context of the proposal.

*We **attach** as **Appendix I** a copy of the document “Draft Auckland Regional Policy Statement Background Report – Surf Breaks¹²” (“ARC 2010”).*

However, it is noted that this body of work has not resulted in policy that has gone into a proposed RPS to date, which is due to changes in the local political scene such as the formation of the Super City. To date it is still unclear whether that body of researched and agreed process will carry through to the new Super City planning documents. None the less, it is clear that ARC intended to pursue the draft policy.

Examples of Surfbreak Protection in other Regional Policy Statements

Since engaging The Department of Conservation Board of Inquiry on surfbreak planning, SPS has also been making submissions on other Regional Authorities Policy Statements as they come up for review :

¹² K. Coombes & B. Scarfe, Environmental Policy and Planning, ARC March 2010.

The Taranaki Regional Policy Statement 2009

Taranaki Regional Council (TRC) is the only region with an operative RPS addressing the protection of surf breaks of regional significance. TRC have identified surf breaks that are important to the region using the council's inventory of Coastal Areas of Local or Regional Significance in the Taranaki Region (2004), the Wavetrack New Zealand Surfing Guide and by consultation with local surfers.

The 81 breaks are mapped showing the location of an individual surf break or by a line extending along the coast where there is a protected surf zone. Some breaks are within a yellow shaded area identified as a "coastal area of local or regional significance", but it is not clear if the extent of the shading reflects the spatial area of the surf break.

No information is provided within the Taranaki RPS 2009 regarding the values of the different breaks or whether some are more significant than others.

In terms of the policy approach TRC has taken to protect these breaks they are referred to in RPS explanations, but not in **objectives, policies or methods**.

8. Coastal environment

Natural features of Taranaki's coastal environment that contribute to its natural character include natural coastal processes, marine life and ecosystems including indigenous flora and fauna (including those distinctive to the Taranaki coast) and biodiversity values, coastal landscapes and seascapes, surfbreaks and areas of forest, shrub land, open space and farmland. Wāhi tapu and other sites of spiritual or cultural significance to Māori, and places or areas with special historical, scientific, ecological or other heritage values or recreational and other amenity values also contribute to the natural character of the coastal environment.

8.2 MAINTAINING AND ENHANCING COASTAL WATER QUALITY

Background to the issue

Areas of outstanding value within the coastal environment will be identified and priority given to the protection of the natural character, ecological or amenity values of such areas from inappropriate development

8.3 Maintaining and enhancing public access to and along the coastal environment

...In some cases, it will be appropriate to promote and enhance public use and enjoyment of the coast, particularly where there are synergies with regards to promoting and enhancing public use and enjoyment of the coastal environment with high natural character and amenity values such as Taranaki's valued surfbreaks..

Appendix II: High quality or high value areas of the coastal Environment

Figures 7-19 below shows coastal areas identified in the Inventory of Coastal Areas of Local or Regional Significance in the Taranaki Region (2004). The Inventory includes important areas in the coastal marine area and in adjacent land within the coastal environment. Some of the areas in the coastal marine area have been identified as areas of outstanding coastal value in the Regional Coastal Plan for Taranaki (1997) while others where the landward component is predominant, have been identified in district plans. However, the coastal areas identified are not necessarily an exhaustive selection and, on occasion, other parts of the coast may have natural, ecological, or cultural values that are regarded as important to the region.

Taranaki is recognised nationally and internationally for its surfbreaks. Surfbreaks depend on the presence of a combination of suitable seabed shape, swell direction and power, swell corridors that allow swells to arrive at the surfbreak and wind direction and force. High quality or high value surfbreaks in Taranaki attract surfers from throughout New Zealand and overseas as well as locally. High quality or high value surfbreaks of regional importance are shown in Figures 7 to 19. The surfbreaks have been identified using the Council's inventory of Coastal Areas of Local or Regional Significance in the Taranaki Region (2004), the New Zealand Surfing Guide (2004) published by Wavetrack and by consultation with local surfers.

[figures 7 -19 are not included within our SPS submission but the Taranki Regional Policy statement along with figures 7-19 can be downloaded from the Taranaki Regional Council website - <http://www.trc.govt.nz/regional-policy-statement/>]

Proposed Waikato Regional Policy Statement Decisions (November 2012)

On the 2nd of November 2012 The Waikato Regional Council released its Proposed Regional Policy Statement, which acknowledged its surfbreaks by :

Implementation methods

12.3.1 District and regional plans

vii) protecting surf breaks of national significance for surfing.

12.5.1 Regional and district plans

Regional and district plans shall:

d) avoid adverse effects of activities on access to, use and enjoyment of surf breaks of national significance for surfing.

12C Natural character of the coastal environment: assessment criteria

Transient / Dynamic Attributes:

related to seasonal / daily change, weather patterns, the motion of water, surf breaks, waterfalls, tidal flows, the presence of wildlife and the degree to which such exposure enhances the relative naturalness of the coastal environment.

Proposed Bay of Plenty Regional Policy Statement

PROPOSED BAY OF PLENTY REGIONAL POLICY STATEMENT COASTAL ENVIRONMENT COUNCIL DECISIONS ON SUBMISSIONS REPORT

Page 151

Explanation

Case law has established that 'natural character' does not necessarily mean pristine or completely unmodified character, rather that natural character occurs on a continuum from pristine to totally modified.

All of the Bay of Plenty coast has some degree of natural character, with this occurring along a continuum from areas which remain in a natural state to areas where few natural attributes exist.

Policy CE 7B 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 is appropriate for the characteristics of the area and will not result in significant adverse effects on the natural character of the coastal environment.

Surfing is an economically and socially important activity in some parts of the Bay of Plenty. Breaks such as that at Matakana have featured in the international media and together with Whakatane Heads are considered to be of regional significance.

It is therefore appropriate that the RPS gives particular regard to avoiding, remedying of mitigating potential adverse effects on regionally significant surf breaks and their swell corridors.

Surfbreak Policy comments for the Proposed Wellington Regional Policy Statement

SPS will be either supporting and / or seeking changes to policies and the insertion of new policies via the changes outlined below to be placed in the Operative Wellington Regional Policy Statement (OWRPS),

. Relevant policies and methods from the PWRPS include :

Section 4.1: Regulatory policies – direction to district and regional plans and the Regional Land Transport Strategy

Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter – regional plans.

support

Policy 4: Identifying the landward extent of the coastal environment – district plans

Strongly Support.

Insert into explanation:

Dune systems especially primary dune systems, must take into account the land – coastal feedback processes for any local surfbreak before engineering is initiated. As well as seawall – rip rap structures and their possible effects on lowering of beach profile.

- (a) any area or landform dominated by coastal vegetation, habitat, or seascape;**
- (b) any landform or surfbreak affected by active coastal processes, excluding tsunami;**

Policy 5: Maintaining and enhancing coastal water quality for aquatic ecosystem health – regional plans.

Strongly Support. Comment : Where ever surfers congregate in the CMA, they are immersed in the aquatic systems that surround that surfbreak, therefore exposed to the water quality in that area

Policy 6: Recognising the benefits from ~~regionally significant infrastructure~~ and renewable energy and regionally significant infrastructure – regional and district plans

[Add]: with respect to swell corridors for surfbreaks

Policy 11: Maintaining and enhancing aquatic ecosystem health in water bodies – regional plans.

Strongly Support. See policy 5 comments

Policy 13: Minimising contamination in stormwater from new development – regional plans.

Strongly Support

Policy 16: Protecting aquatic ecological function of water bodies – regional plans.

Strongly Support

Policy 17: Protecting significant values of rivers and lakes – regional plans.

Strongly Support

Policy 20: Identifying places, sites and areas with significant historic heritage values– district and regional plans.

Strongly Support comment: Lyall Bay was the first place surfed by the father of modern surfing, Duke Kahanamoku in 1915 and therefore is a historically significant place for surfing

Policy 21: Protecting historic heritage values – district and regional plans.

Strongly Support

Policy 24: Identifying outstanding natural features and landscapes – district and regional plans

Strongly Support

Policy 25: Protecting outstanding natural features and landscape values – district and regional plans

Strongly Support in principle, should be added; “Protecting outstanding natural features, ~~and~~ landscape, and seascape values – district and regional plans

Policy 26: Identifying significant amenity landscapes ~~values~~ – district and regional plans.

Strongly Support [Add] and Seascapes

Policy 27: ~~Maintaining and enhancing~~ Managing significant amenity landscape values – district and regional plans.

Support

Policy 28: Avoiding subdivision and inappropriate development in areas at high risk from natural hazards – district and regional plans.

Strongly Support – particularly in primary dune systems and close shore areas.

SECTION 4.2: REGULATORY POLICIES – MATTERS TO BE CONSIDERED

Policy 34: Preserving the natural character of the coastal environment – consideration.

SPS Strongly Support

Policy 35: Discouraging development in areas of high Managing effects on natural character in the coastal environment – consideration

SPS supports

Policy 36: Safeguarding life-supporting capacity of coastal ecosystems – consideration

Policy 37: Identifying the landward extent of the coastal environment – consideration

SPS strongly support

Policy 39: Maintaining and enhancing aquatic ecosystem health – consideration

SPS strongly support

Policy 41: Minimising contamination in stormwater from development – consideration

SPS strongly support

Policy 49: Managing effects on outstanding natural features and landscapes, and significant amenity landscapes - consideration

SPS recommends insertion of Seascape

SECTION 4.4: NON-REGULATORY POLICIES

Policy 64: Supporting environmental enhancement initiatives – non-regulatory

Policy 65: Promoting efficient use and conservation of resources – non-regulatory

Section 4.5: Methods to implement policies

4.5.2 Non-regulatory methods – information and guidance

Method 20: Information to assist with the identification of places, sites and areas with significant historic heritage values

Method 27: Integrate management across mean high water springs

Method 49: Prepare a regional landscape character description

Although surf breaks are not yet specifically provided for in the PWRPS; the recent release of the NZCPS (3rd December 2010 prior to the public Consultation of the PWRPS) still requires the proposal to give effect to its provisions for surf breaks.

There is minimal guidance on surf break protection within local government, as it is a new concept in statutory RMA terms. However the knowledge and understanding of surf break preservation and sustainability is substantially founded and well researched. There are a number of specialists around the country that contribute toward the field who work with SPS to promote the preservation and sustainability and enhancement of surf breaks around New Zealand.

While the above is focused on the merits of the obligations highlighted in the NZCPS 2010, SPS put forward also other changes to the PWRPS as outlined in comments below including decisions sought.

Summary

SPS seeks the following decisions from the Wellington Regional Council .

1. Recognise that areas have landscape and **seascape** values which add to the sense of place and amenity of an area and that these values should be maintained or enhanced where possible.
2. Insert **seascapes** into Policy 24: Identifying outstanding natural features and landscapes – district and regional plans
3. Insert **seascapes** into Policy 25 Protecting outstanding natural features and landscape values – district and regional plans.
4. Insert - peninsulas, cliffs, dunes, **wetlands**, reefs, freshwater springs and **surf breaks**; into Policy 26
5. Insert into Policy 20: Identifying places, sites, areas and **seascapes** with significant historic heritage values– district and regional plans
6. Add and insert “Policy **X**: Protecting Surf breaks

The natural character, landscape, recreational, amenity, and economic values of regionally significant surf breaks shall be maintained and enhanced by taking into account any existing and potential effects of activities on land, in fresh water ways, estuarine systems or in the coastal marine area on access to, and use and enjoyment of and regionally significant surf breaks, including effects on water quality, and on any coastal processes, currents, water levels, seabed morphology and swell corridors that contribute to surf breaks.

7. Give effect to the NZCPS 2010 of policy13, 15 and 16.
8. Add NZCPS 2010 to Definitions – Surf break. -- *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.

9. When applying methods to this policy ensure that they require the Regional Council and District Council to give effect to the above policy.

10. Add new Method – Baseline Monitoring of Surf breaks;

Add a new method into the proposal as follows:

“Method X: Baseline Monitoring of Surf breaks. Regular baseline environmental monitoring of the regions surf breaks shall be undertaken. Encourage working with surf break organisations and surfing interest groups in forming an environmental monitoring programme for the regions surf breaks.”

11. Identified values and characteristics of outstanding natural features and landscapes and **seascapes** of regional or local significance are protected from adverse effects, including cumulative effects, arising from activities within or adjacent to the landscape or feature.

12. Protect natural character

Ensure that activities within the **coastal environment**, **wetlands**, headlands, peninsulas, cliffs, dunes, reefs, freshwater springs and **surf breaks**; and lakes and rivers and their margins are appropriate in relation to the level of natural character:

13. Insert- **surf breaks of national and regional significance** into Policy X)

Protect areas of high amenity value

Areas of high amenity value are identified, and those values are maintained or enhanced. These may include:

- a) areas within the coastal environment and along inland water bodies;
- b) scenic, recreational or historic areas;
- c) areas of spiritual or cultural significance; and

d) scientific and landscape features.

e) **surf breaks of national and regional significance**

14. Identify surfbreaks of Regional and National significance with the assistance of surfing groups like The Surfbreak Protection Society.

A regional listing of surfbreaks should include those mentioned in appendix 11 attached to this submission

Further Comment:

The NZCPS provides direction for the proposal to provide for surf breaks under Policy 13, 15 and 16.

In regard to Policy 16 there are no nationally significant surf breaks in the Wellington region. That said, SPS and other surfing organisations including the Wellington Surfriders Club Inc had submitted to the NZCPS BOI the merits of the Spit at White Rock to be included, which rates a 10 in the Wave track Guide.

The coastline around Cape Paliser, from White Rock to Ning Nong - to Lake Ferry river mouth and westward has notable surfbreaks, and this area is an international attraction for surfing tourists.

White Rock had made it on to the initial shortlist of only 7 National Surfbreaks in the:

[Report To The Board Of Inquiry On The Proposed New Zealand Coastal Policy Statement 2008](#)

Policy 20 in the PNZCPS, (which became Policy 16 in the now operative NZCPS) read :

Policy 20 Surf breaks of national significance

The surf breaks at Ahipara, Northland; Raglan, Waikato; Stent Road, Taranaki; White Rock, Wairarapa; Mangamaunu, Kaikoura; and Papatowai, Southland, which are of national significance for surfing, shall be protected from inappropriate use and development, including by:

a. ensuring that activities in the coastal marine area do not adversely affect the surf breaks; and

b. avoiding, remedying or mitigating adverse effects of other activities on access to, and use and enjoyment of the surf breaks.

During further consultation regarding more surfbreaks to be included, it is believed that the Spit, White Rock was somehow dropped from the list, probably by error.

The Spit at White Rock has a 10 out of 10 rating in the Wave track guide, and is regionally, as well as nationally significant.

It is the intention of surfing organisations to seek the reintroduction of the Spit, White Rock into the operative NZCPS by way of variation or the next consultation on the NZCPS.

SPS believes it is necessary to include policy in the proposed WRPS which is the equivalent of NZCPS Policy 16 but in a regional context. This is to ensure the preservation and protection of surf breaks, and their inherent features and characteristics that contribute toward wave quality and the surfing experience. And this must include components both landward and seaward of the MHWS in the coastal environment.

Identification and mapping areas of natural character, landscapes (including seascapes), and the extent of the coastal environment is preferred by SPS in the OWRPS. This will provide the clearest form of guidance to local authorities and decision makers on where development is appropriate and inappropriate.

To date, coastal development has regularly been carried out on an ad hoc basis through lack of guidance on what is appropriate or inappropriate development. The NZCPS provides clear guidance on what makes up natural character, therefore mapping these areas (including surf breaks as per NZCPS Policy 13, 15, 16) within an area identified as the coastal environment would provide the guidance required to reduce ad hoc development and better provide for sections 6(a), 6(b) and 6(d) and Part 2 generally of the RMA.

There is a necessity to include reference to seascapes in the proposal. As mentioned above the NZCPS Policy 15 includes seascapes as natural landscapes.

It would not be appropriate to adopt the status quo from the current Regional Policy Statement, as restricting identification of outstanding natural features and landscape areas to District Plans excluding seascapes would create an inconsistency with the NZCPS 2010.

SPS believes that the Wellington Regional Atlas provides the appropriate tool and methodology for spatial mapping required to assess the natural character, natural features and landscape (**including seascape**) of the coastal environment by the various means outlined in these policies.

It is recommended that the new OWRPS provide for a policy and objective to identify or map outstanding natural features and landscapes in both Regional and District Plans, and in doing so provide for the geological, topographical and dynamic components of surf breaks and their transient values.

SPS considers that giving effect to these policies and methods are vital towards recognising section 6(a), in achieving the purpose of the RMA.

SPS believes this may compliment the process of reviewing the Regional Coastal Plan, which must also give effect to Policy 13 and 15. This is because the integration with the Wellington Regional Atlas could coincide with detailed coastal spatial mapping in this plan. Which then at that stage, could take place with SPS and coastal communities contributing to a robust consultative process.

Policy makers require a recognised set of criteria that supports a substantive rating relative to the level of natural character attributable to any given surf break. Assessment of surf breaks against these criteria would be led by surfing communities, preferably facilitated by local authorities during formal and informal consultation processes.

A surf break policy would specifically focus on a component of the natural environment and address the need to protect that component from the negative effects of other activities on it and ensure that adequate regard is given to potential effects. It would adequately recognise and provide for surfers to meet their social and cultural needs, and for other people and communities to meet their economic needs, as well as providing for the foreseeable needs of future generations.

A draft policy that SPS recommends is:

Protecting surf breaks

The natural character, landscape, recreational, amenity, and economic values of regionally significant surf breaks shall be maintained and enhanced by taking into account any existing and potential effects of activities on land, in fresh water ways, estuarine systems or in the coastal marine area on access to, and use and enjoyment of regionally significant surf breaks, including effects on water quality, and on any coastal processes, currents, water levels, seabed morphology and swell corridors that contribute to surf breaks.

SPS will attach Appendix 11 to this submission, list of regionally significant Surfbreaks

SPS is opposed to viewing the coastal marine area as an important area for discharges of sediment and contaminants. The second generation PWRPS should be 'raising the bar' on water quality.

SPS wish to reserve the right to be heard and make a more detailed statement of evidence or oral evidence at the time of the hearing. Additionally, SPS wish to also make comments and further submissions at the appropriate time.

Dated 19th December, 2012

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SIGNED on behalf of

Surfbreak Protection Society Inc.

Michael Gunson

SPS Committee Member and Wellington Representative

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Surf Breaks of National Significance

SCHEDULE 1- Surf Breaks of National Significance

Northland

Peaks – Shipwreck Bay

Peaks – Super tubes – Mukie 2 – Mukie 1

WAIKATO

MANU BAY – RAGLAN

WHALE BAY – RAGLAN

INDICATORS – RAGLAN

Taranaki

Waiwhakaiho

Stent Road – Backdoor Stent – Farmhouse Stent

Gisborne

Makorori Point – Centres

Wainui – Stock Route – Pines – Whales

The Island

COROMANDEL

WHANGAMATA BAR

Kaikoura

Mangamaunu

Meatworks

Otago

The Spit

Karitane

Whareakeake

Papatowai

(Comment :White Rock left out possibly by administrative error)
