

New Zealand Four Wheel Drive Association  
Central Zone PRO  
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Horowhenua District Council  
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Levin

22 September 2000

Dear Peter,

**Re Submission to “Draft Foxton Beach Coastal Reserve (Off Road Motorised Recreational Use)”**

As always, we are pleased to be asked to respond to your submissions processes regarding recreational vehicle use of the Foxton Beach area.

To reiterate, as previously cited in other documents, the Four Wheel Drive Association is the National representative body encompassing some 29 4WD Clubs, and a total of around 5,000 Members, their families and friends.

We see the draft policy document as a progression from the Draft Foxton Beach Coastal Reserve Management Plan. You will recollect that in our previous comments about that document, we found it extremely wanting in scientific fact. Indeed, it appeared to fly in the face of current scientific evidence. It is regrettable then that this new Policy document seems to perpetuate some of the misnomers begun in the former.

It is difficult then to provide full consultative feedback when the document we are discussing is based upon another document which we sincerely trust will be drastically modified so as to provide scientific credibility. You will perhaps not be surprised to learn that we find this new Policy, somewhat equally lacking in credibility.

Whilst the overall goals are laudable, the rhetoric is extremely “one-eyed”. Take for example pp 6 *“The Draft Foxton Beach Coastal Management Plan sets out the ecological and other reasons for limiting vehicle access to the dune area. It is not the purpose of this report to question those reasons. Suffice to say common sense needs to prevail if the dune area is, at a minimum, to remain in its present condition”*

So it appears that the decision to restrict vehicle access has already been taken *before* the Draft Foxton Beach Coastal Reserve Management Plan has been finalised! Now we felt we had clearly demonstrated that vehicle impacts were as naught compared to that of the Earth Processes. Remember the quoted calculations from our previous

submissions, that approx 1 truck-load of sand is being moved through the area every two seconds? Simple, scientific observation, not speculation, but putting any vehicle impacts fairly into perspective.

We produced archive photographs that seem to show little variation in either vegetative cover or dune topography over the past 80 years or so. We produced a quite detailed critique of the Draft Foxton Beach Coastal Reserve Management Plan, but still we have a new document based upon emotive statements with no proof of the author's contentions. Can Council not produce any hard evidence to support its claims?

However, returning to the draft at hand, the quote above also cites "common sense". But who's common sense? Council has not yet stipulated what its objectives are for the dune area, other than to manage it for recreational use. But what of the dunes themselves? Should they be encouraged to grow? Should they be encouraged to subside? Should they be grassed over? Should blow-holes be prevented? Should blow-holes be encouraged? Should we interfere with the particular Earth Processes involved? Should we stand back and watch? More likely, should we not watch and also monitor?

Clearly, the only thing that can be served by "common sense", is to ask Council to create a set of realistic objectives and then look at how those objectives can be achieved. The proposed user forums would be an ideal medium through which to gain user involvement in setting such objectives.

It should also be remembered that the Draft Foxton Beach Coastal Reserve Management Plan suggested Council make provision to deal with sea level changes. An objective somewhat beyond the capabilities of Council, so hardly realistic. Even King Canute was unable to repel the inexorable turn of the tides, Council are hardly likely to succeed any better.

However, Council can create attainable objectives and then encourage all user groups to assist Council in meeting those objectives. Without such a common goal, it's difficult to know which direction any Management policy should take.

Nonetheless, our comments to the policy document continue:

Under section (4) Ecological Issues, great mention is made of purported scientific explanation of sand compaction and the turbidity of particulate matter by motor vehicles. Unfortunately, no measurements have been provided to indicate any relevance this might have at Foxton. What is the particulate nature at Foxton, its mean diameter, its variation in granularity, shape, size and construct. Is all sand, in all the dunes at Foxton the same, the same particulate interlock, the same compaction? How does any of this pertain to the assertions made, and in any event, is it of any relevance?

Great weight also appears to be made of the effects of (what Council refers to as) ORVs on soils and subsoils. But what relevance is this? Are the authors simply applying the broadest possible latitude to the meaning of "soils" to include pure sands? Or are the points lost in dealing solely with sand? Or do Council know of areas with effective subsoils where ORVs are creating perceived problems? It is hard to deduce from the report.

As we have already stated, the effects of ORVs is a naught to that of the earth processes, so any further discussion, no matter how graphically illustrated, seems inappropriate. The report appears to hint that maybe a “bit” of wind erosion may be taking place, but the bias leaves the reader sensing that only ORVs are to blame. In fact, the converse is the truth.

The report continues “...*If all vehicles regardless of weight and size were to operate at tyre pressures around 20psi, track damage would be reduced significantly.*”

What a gross generalisation. A large 4WD such as a Nissan Patrol would be in serious danger of tyrewall/bead separation if tyre pressures were reduced to such an extent. Whereas a standard Suzuki 410, a Land Rover Series II, or indeed an early Range Rover would notice little effect reducing tyre pressures by such a small amount.

To be able to significantly and safely reduce tyre pressures for low-speed competition, the 4WD Association National Series Competitors are mandated to fit tubes to all tyres. Yet to do so on a road-going vehicle could be extremely dangerous. Tubeless tyres become more liable to sudden and catastrophic failure at speed when fitted with tubes than without. You simply can't have it both ways.

Whilst we are in complete sympathy with Council's intentions with regard to tyre pressures, for Council to get into the business of dictating or even simply recommending tyre pressures could prove problematic. The very first damage or accident resulting from following such grossly generalised advice may well see litigation against Council for consequential damages.

It can also be argued, that vehicles with low tyre pressures can access steeper dune structures than those with high pressures. Getting “novice and inexperienced” drivers well and truly stuck before they even can get to the larger dune structures could actually then be far less damaging overall. Perhaps then it may not be that desirable to encourage tyre deflation? More discussion is needed we feel.

Many references are made to vehicle types and statistics. The suggestion is that second hand vehicle prices may drop, “having little residual value”. Maybe, maybe not. Even today, anyone can pick up a running 4WD for \$200. The fact is that very few actually do, so why should that trend be any different in the years ahead?

The authors also express “surprise” that LTSA does not hold details of the number of 4WDs registered. It certainly is a surprise to us, since such details are readily obtainable from LTSA, and a number of commercial organisations. If you have difficulty, we would be only too willing to assist.

Under the heading of “Organised Activities”, whilst we naturally accept that we regard ourselves as responsible and caring, we wonder where the differentiation can be made between an “organised activity” and an unorganised one. Most 4WD Clubs visit Foxtton Beach, stay at the motor camp, and venture out each day in small groups for recreational purposes. These then are totally unorganised. But what would constitute an “organised” event?

The most usual organised event would be working bees, with planting and rubbish collection high on the agenda. Is it suggested that volunteer groups have to satisfy the red tape requirements, whilst others enjoying their recreation do not? If so, it's one way of discouraging user involvement in maintaining the beach environment.

Perhaps we need further clarity to determine what types of event would be subject to permits, and which would not.

It is also difficult to see any connection between the Health and Safety in Employment Act (The Authors appear confused between the Labour Department OSH division, and the HSE Act), and volunteer groups. What relevance is there between the Resource Management Act and a Safety Policy? And perhaps Council could advise which particular by-law demands volunteer groups formulate a safety plan?

Naturally, everyone wants to ensure safety remains paramount in people's minds, but draconian policies usually serve to backfire on authorities.

Under the heading of "noise", it is difficult to draw any relationship between noise and unregistered vehicles. Any vehicle is capable of creating excessive noise, and should be dealt with accordingly. The simple statement seems only to indicate that the Authors have some particular beef with unregistered vehicles. The point is repeated throughout the document.

We agree with the comments pertaining to fire.

When dealing with abandoned vehicles, Council can make use of volunteer groups. We have previously run weekends removing vehicles from the beach, and we have also made representations to you that disposal costs are so high as to persuade people to dump cars willy-nilly.

No matter what is done to reduce the availability of dumping sites on the beach, people will simply take them and abandon them elsewhere. It is far more likely that the problems of dumped vehicles will simply move, with vehicles being more difficult and/or costly to recover. Whilst in no way can we condone vehicle dumping, at least it is easy to remove vehicles from "the dome".

We would urge Council to look at schemes whereby people can dump vehicles for free, even if only for certain periods each year. It may just help reduce the number of abandoned and burnt-out vehicles.

When dealing with speed, it seems to be rarely a problem within the confines of the four zones mentioned. Further north towards Himatangi, with little or no people around, vehicle speeds tend to increase, but the vast majority of users are responsible and do take care around the more populated areas.

To be truly proactive, Council might do better to periodically set up a high-speed circuit in the larger domes to allow the local "petrol heads" to enjoy a periodic "burn" in an enjoyable but nonetheless controlled environ. Working with users rather than against them has always been the hallmark of successful councils.

Indeed, under any headings of "enforcement", the question must be surely "what are Council trying to achieve?"

Bringing the full weight of the law down on the operators of allegedly "illegal vehicles", usually a younger element, Council does nothing to provide them with an outlet for exuberance. Placing police on the beach with the demands of a "zero tolerance" policy will simply drive these people elsewhere. Damage will move further

up the beach into more ecologically sensitive areas, or heaven forbid, these same people may turn to other more antisocial activities..

Council should think long and hard before pursuing such stringent measures. At present, perceived illicit activities are contained. The emergency services have ready access to the bowl and surrounding areas where most of these activities take place. In short, if the activities are going to take place anyhow, why not mitigate the risks and the impacts?

In dealing with this section on “Compliance and Enforcement”, we are particularly disappointed that whilst this is purported to be a consultative document (and our comments are above), Council has already taken the matter to the police and agreed a course of action. All this before we have had the opportunity to make submissions?

The document simply advises us that the police will be pursuing a ‘zero tolerance’ option. How sad that you simply couldn’t wait to hear user viewpoints.

In summary, we have to find this document seriously problematic. Not least of which, simply because it is based upon a previous document we expect to be withdrawn or severely modified.

Whilst we appreciate Council’s enthusiasm to see this matter resolved, we would suggest that it would be far better to set aside the Draft Foxton Beach Coastal Reserve (Off Road Motorised Recreational Use) as presented, convene the promised user group forums, and use those as the vehicle to develop meaningful, workable Management Plans.

That we would support wholeheartedly, and offer any and all assistance we can.

Would you please then register our opposition to this report and place our suggestions for proceeding on your records.

Many thanks for the opportunity to make these submissions.

For and on behalf of  
New Zealand Four Wheel Drive Association  
(Central Zone)

Andy Cockroft  
Public Relations Officer