



Paroa
P.O. Box 66, Greymouth 7840
The West Coast, New Zealand
Telephone (03) 768 0466
Toll free 0508 800 118
Email info@wcrc.govt.nz
www.wcrc.govt.nz



15 June 2022

WCRC Reference: RC-2022-0039
WDC Reference: RC220053
Enquiries to: Kate McKenzie/Fiona Scadden

West Coast Regional Council
C/- BECA
PO Box 13960 Armagh Street
Christchurch 8141

Attention: Paul Whyte

By email: paul.whyte@beca.com

Dear Paul,

RC-2022-0039 AND RC220053: TO CONSTRUCT A SEAWALL, HOKITIKA BEACHFRONT - REQUEST FOR FURTHER INFORMATION.

An assessment of the application to construct and maintain a seawall at Hokitika Beachfront has identified the need for us to ask for additional information relating to the application.

Pursuant to section 92(1) of the Resource Management Act 1991 the Councils request further information in relation to the consent application.

The further information requested is:

1. A number of reports are referenced in the application, which may assist to better understand the application if provided in full – please provide a copy of the following:
 - a. West Coast Penguin Trust report on Kororā
 - b. Civil 3D Profile survey of the Mean High Water Springs line
2. It is acknowledged that the application seeks consent for works within the Coastal Marine Area on the basis that the toe of the seawall will in places be below the Mean High Water Springs line. Please advise whether the applicant is aware of any significant changes to this line since the profile survey was undertaken in 2021 i.e. whether further erosion or accretion has taken place.
3. The application is not clear whether the seawall/rock material will be removed at the end of the term of consent. Please provide information regarding the proposed end of life plans for the seawall.
4. The aerial photograph in Section 2 (Figure 2.1) notes a "Provisional Extension" at the Richards Drive end of the seawall. Please confirm whether this forms part of the current application. If it does, this may introduce the requirement for additional consents relating to the waterway indicated in the AEE, and further assessment of the effects of this extension will also be required.

5. The application notes that the emergency works undertaken in the same area between 2019-2021 do not form part of this application, however the rock material, where practicable will be re-used as part of this proposed seawall. In section 3.2.3 of the application it states that there is approximately 10,000 tonnes of the 16,000 tonnes that can be re-used. Please advise what will happen to the remaining 6,000 tonnes of rock, which is presumed to be within the footprint of the proposed seawall. Will it be retained on the beach, or removed for disposal?
6. Section 3.2.3 of the AEE also notes that approximately 48,000m³ of material will be placed in the dune area. It is assumed that a similar volume of material will be displaced. The AEE states that this sand will be replaced following excavation. Please advise what the impact of the displacement of this material will be on the beach profile.
7. Section 5.3.11 of the AEE states that the dust effects of the proposal will be less than minor. Please advise whether the activity can be carried out as a permitted activity, or will require an air discharge permit under the Regional Air Quality Plan.
8. Section 6.2.6 discusses the consultation that has occurred with Te Runanga o Ngāti Waewae, which includes requesting a consent condition which would require the applicant to plan for an implement an adaptive management strategy for the longer-term management of coastal hazards at Hokitika. Acceptance of such a condition by the applicant is noted. Further details of any proposed conditions to address this matter are required, in order to ensure that such a condition is not *ultra vires*.
9. Please provide further details about the potential staging of the seawall construction. The application notes in Section 7.5 that "the more practical and effective approach to construction is to commence construction from the southern end tie in position and advance northward as funding allows". Elsewhere the application indicates that construction will take approximately 6 months. If the seawall is not fully funded, and the construction works can be expected to take place over a number of years, please provide information about the intended staging of works, including:
 - If the sea wall construction was to be staged, what would be the immediate and long term effects (including access, visual impact, erosion risk) on adjoining properties and the coastal environment, while the wall is incomplete?
 - Are there specific stages recommended to reduce effects on adjoining properties and the surrounding environment?
 - If the sea wall construction is to be staged, what would be the maximum timeframe between stages?
 - If the sea wall construction is to be staged, what would be the maximum timeframe to completion?
10. Section 9.3 assesses the proposal against the Regional Policy Statements, however the 2000 Regional Policy Statement is no longer operative, and the 2020 West Coast Regional Policy Statement is now operative. The applicant may wish to provide a revised assessment to ensure that the current objectives and policies of the operative Regional Policy Statement have been appropriately assessed.
11. The AEE notes that two Taonga species listed in Schedule 97 of the Ngāi Tahu Claims Settlement Act 1998 are present and may be affected by the proposal (Kororā and Pīngao). It is noted that the AEE confirms that the applicant has agreed to a Cultural Impact Assessment being conducted. The provision of this Cultural Impact Assessment is required to better understand the potential effects of the proposal on Te Rūnanga o Ngāti Waewae cultural values.
12. Please provide any correspondence received in response to the notice served on Te Rūnanga o Ngāi Tahu and Ngāti Toa Rangatira under Section 62(3) of the Marine and Coastal Area (Takutai Moana) Act 2011.

13. The proposed seawall design provides for access ramps at each of the public road accesses along the length of the application area, which appears to have a GAP100 finish. Please explain how these ramps will perform over the life of the seawall (i.e. initially when sand covers the majority of the wall as opposed to if erosion of the beach material occurs and the wall is more exposed), the suitability of the proposed surface for pedestrian use, and whether a maintenance regime is proposed to ensure suitable and ongoing access.
14. Tonkin and Taylor have been engaged to conduct a coastal engineering review of the application under section 92(2) of the RMA 1991. The preliminary review has highlighted a number of questions which require a response prior to the peer reviewer being able to complete their report. The questions are contained in the attached memorandum. Please provide the requested information and a response to the questions contained in this memorandum.
15. The construction of a sea wall on the road reserve is not listed as a permitted, controlled, restricted discretionary or discretionary activity within Part 6 of the Westland District Plan. The activity is also not a permitted activity for the underlying zone as per 8.7 of the Westland District Plan.
 - Please provide assessment of Part 6 and Part 8.7 of the Westland District Plan and provide further information regarding the status of the non-complying activity.
16. As per 5.2.3 of Hokitika Seawall Extension – AEE, it is noted that Little Blue Penguins breed between June and January and move around less frequently between March and May.
 - Please clarify whether the proposed six months of construction works will be undertaken to avoid breeding season or utilise the time of less frequent movements being March to May.
17. As per 5.3.2 of Hokitika Seawall Extension – AEE, please clarify:
 - What provisions will be put in place to ensure successful monitoring of the sea wall condition, post storm events?
 - How will a storm event be quantified to be large enough to check the rock work?
 - How soon after a storm event will a staff member be deployed to assess the potential damage to the rock work?
 - What level of damage would constitute the need for remediation works?
 - How will these works be carried out and how will those employed to undertake the activity be suitably qualified to do so?
 - How soon after an event would these works be carried out?

When addressing the above items, please ensure practicable and specific intentions are volunteered where appropriate as this is likely to inform the conditions associated with the decision.

18. As per 5.3.8 of Hokitika Seawall Extension – AEE, please assess and explain:
 - The potential visual impact on adjoining properties regarding the height of the sea wall, being higher than current ground height as demonstrated in Figure 3-2 Cross section of seawall- higher toe height.
19. As per 5.3.9 of Hokitika Seawall Extension – AEE, please assess and explain:
 - How many vehicle movements per day are expected with a summary of heavy vehicles as well as contractor/staff/ operator vehicles.
 - The type and number of heavy machinery/vehicles expected to be operating on the site.

What you have to do now:

Under Section 92(1) of the Act, in accordance with section 92A(1) you must, within 15 working days of the date of this request, take one of the following options:

- a) Provide the information; or
- b) Tell the Councils, in writing, that you will provide the information and give an indication of the timeframe for providing the information; or
- c) Tell the Councils, in writing, that you refuse to provide the information.

If you do not take one of these options within 15 days the Councils may notify your application or decline your application due to insufficient information being supplied.

Pursuant to section 88C(1) the Council will postpone the processing of your application until we receive this information.

Please do not hesitate to contact us to discuss any queries you may have.

Yours faithfully,



Kate McKenzie

Consultant Planner
West Coast Regional Council

Kate.mckenzie@tpri.co.nz
027 600 3586



Fiona Scadden
Consultant Planner
Westland District Council

fiona@rataprojects.co.nz
027 422 4525