

West Coast Regional Council

Cc Westland District Council

14 July 2023

Don Neale

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Tēnā koe

**Submission to resource consent applications RC-2022-039 & 220053 by West Coast Regional Council, to WCRC and WDC, for a seawall on Hokitika Beach.**

This submission is a personal one by me, as a ratepayer and resident within the Hokitika rating district, a regular recreational user and observer of Hokitika beach for the past 35 years (living close to the beach over almost all that time), and with a Master of Science (1<sup>st</sup> Class Honours) in Coastal Geography from Canterbury University.

Please note that this is a personal submission that has no connection with my professional role or my employer.

I am 'opposing' the application under the terms of the RM Act, but I wish to work constructively with the Council to ensure that a good and well-informed outcome is achieved for ratepayers, residents and the two councils. I feel that I have useful advice and information to contribute to this, and I have demonstrated this intent for over 30 years.

I wish to be heard in support of my submission.

I am willing to consider joining with other submitters in any hearing on this application.

**The reasons for my submission**

I oppose the application on the grounds that:

1. It is contrary to s6(a) and 6(d) of the RM Act, the New Zealand Coastal Policy Statement (NZCPS), the NZCPS guidance reports and other planning documents.
2. It does not properly provide for the natural dynamics of the shoreline, and is not consistent with the principles of good coastal hazard management.
3. It will diminish or even destroy the recreational and amenity values for which I enjoy both the beach itself and the town's seaside setting.

4. It will incur a considerable financial cost to me (and to others like me) as a ratepayer within the Hokitika Rating District, with zero benefit to anyone other than perhaps some temporary benefit to the immediate beachfront residents on Revell Street.

Despite this, I support a consent being issued for a seawall along this section of coast, but only with appropriate consent conditions and as a precautionary measure, so that the consent might be activated when required as part of an overall adaptive plan for coastal hazards in Hokitika.

### **Effects of the seawall**

The application proposes a seawall that is positioned such that the natural beach system will be 'cut in half', making the shoreline far less effective as a dynamic barrier to wave inundation and coastal erosion.

The most effective place for a seawall is directly adjacent to the assets it is intended to protect. Placing a seawall as far landward as possible helps to provide the most effective protection that it can. This makes it a last line of defence, and makes it much less vulnerable to wave attack. It then leaves the natural beach to function as it should, providing a natural and free form of protection for coastal assets.

A seawall does not arrest the processes of beach erosion, it simply reduces the landward encroachment for a period of time. If the processes of beach erosion continue, then the seawall will eventually be undercut and will fail.

If coastal erosion processes continue, even a seawall placed along the property boundaries might eventually result in the loss of the beach (as has recently happened along much of the CBD seawall), but it is important to delay that eventuality for as long as possible, so that costs and adverse effects are minimised.

Also, the seawall does not need to be built until it becomes clear that it is necessary to protect the beachfront properties.

A seawall can benefit only those who live or own assets on the seaward side of Revell Street. If the sea is going to encroach further inland (such as to Sewell Street and beyond), then no seawall design could be at all effective in stopping that from happening.

The short 15-year term of the consent that is sought indicates that the seawall is 'under-designed', and will provide very little if any benefit to property owners.

Lessons can be learned from the existing seawall in front of the Hokitika CBD, which can inform predictions of the likely effects of the proposed seawall extension. The CBD seawall has resulted in the virtual loss of all access routes to the beach, the loss of the beach foreshore itself, and significant costs (in time and money) that could have been directed to more effective and sustainable solutions.

### **Consent conditions that I could support**

I could support the application if enforceable consent conditions were imposed to ensure that:

1. Decisions about the seawall are as well informed as possible with good expert advice.
2. The seawall is placed as far landward as possible, on or immediately adjoining the Revell St private property boundaries, so that it serves as a last line of defence for beachfront private properties.
3. A 'trigger line' is included, so that the seawall is not constructed until the beach erosion scarp/vegetation line is within 10 metres from the private property boundaries, when a seawall might become necessary to protect private properties on the seaward side of Revell Street.
4. A staged approach is used to construct the seawall only along sections of beach (e.g. between street blocks or access points) where the trigger line has been reached.
5. The physically dynamic beach and dune system is maintained to function in as natural a way as possible.
6. Easy public foot access is maintained at all current access points (Stafford St, Hampden St, Tudor St, Spencer St, Richards Drive).
7. Amenity values of the beach and access points are maintained as far and for as long as possible (including the full restoration of the grassed Tudor St beach entrance and Richards Drive access point).
8. Funding for the seawall is borne primarily by those who will benefit from it (i.e. Revell St beachfront property owners).
9. The area is restored to a natural vegetated dune formation as much as possible after the seawall is constructed.
10. The seawall is removed or suitably altered if it proves to be ineffective or detrimental to beach stability (including end effects).
11. Clear plans are in place for the end of the 15-year consent term, including the option of removing the seawall at that time.
12. An adaptive management plan (including options for risk mitigation and managed relocation of assets) is developed for the town of Hokitika, with a focus on the beachfront properties and CBD that are subject to the greatest risk.

I would be very willing to discuss these conditions with the Council, to seek a solution that is agreeable to all parties.

Kā mihi



Don Neale