



NZ TRANSPORT AGENCY
WAKA KOTAHI

RESOURCE MANAGEMENT ACT 1991

Submission on the Proposed West Coast Regional Coastal Plan

To: West Coast Regional Council
PO Box 66
GREYMOUTH 7840

Submitter: NZ Transport Agency
PO Box 1479
CHRISTCHURCH 8140

This is a submission on the following:

Proposed West Coast Regional Coastal Plan 2016.

The NZ Transport Agency could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that this submission relates to are:

The proposed Regional Coastal Plan in its entirety.

The NZ Transport Agency's submission is:

(1) General Comment

The NZ Transport Agency (the Transport Agency) supports the intent of proposed West Coast Regional Coastal Plan 2016, which aims to improve the planning framework and promote sustainable management.

(2) Specific Provisions of the Proposal

Policy 5.3.6 - Where a coastal protection structure is considered necessary in a Coastal Hazard Area ... the need to protect regionally significant infrastructure from coastal hazards may take priority over the requirement in Policy 3.3.5 to avoid adverse effects on the values listed in Policy 3.3.5. Remediation or mitigation of adverse effects on these values will be required as far as practicable.

Our submission: Support.

This policy recognises the importance of significant infrastructure, including the transport network, and the explanatory note specifically mentions state highways. The Transport Agency supports the inclusion of this policy.

Decision Requested

- Retain policy 5.3.6 in its entirety.

Rule 12 - Drop out repairs of the coastal State Highway

Our submission: Support in part

This rule is similar to Rule 8.5.1.5 of the current Regional Coastal Plan which provides for drop out repairs of the state highway network as a controlled activity. However, it is noted that the terminology

has been amended to specifically refer to “rock protection structures” only and this limits the scope of works included within drop out repairs.

The Transport Agency supports this rule in part, but submits that it be amended to reflect the full range of activities which the Transport Agency may undertake in association with drop out repairs.

The terminology used throughout other chapters and parts of the proposed Regional Coastal Plan is “coastal protection structures” and this would be more appropriate to use in proposed Rule 12.

It is also noted there is an incorrect rule reference – it refers to “Controlled Rule 22”, when it should refer to Controlled Rule 23.

Decision Requested

- Rule 12 be retained, but modified to read “all structures, including coastal protection structures, for drop out repairs of the coastal state highway network, and the associated occupation of space are a controlled activity”.
- Change the incorrect reference to “Controlled Rule 23”.

Rule 23 – Disturbance and deposition associated with coastal State Highway drop out repair structures

Our submission: Support in part

As with proposed Rule 12, the Transport Agency suggests that Rule 23 be amended to reflect the full range of activities which the Transport Agency may undertake in association with drop out repairs, and to ensure consistency in terminology used throughout other chapters and parts of the proposed Regional Coastal Plan.

Decision Requested

- Rule 23 be retained, but modified to read “all structures, including coastal protection structures, for drop out repairs of the coastal state highway network, and the associated occupation of space are a controlled activity”.

The reasons for this submission are:

The NZ Transport Agency's statutory objective is to carry out its functions in a way that contributes to an affordable, integrated, safe, responsive and sustainable land transport system. Some of these functions relevant in this case are:

- to promote an affordable, integrated, safe, responsive, and sustainable land transport system
- to manage the state highway system in accordance with the relevant legislation; and
- to assist, advise, and co-operate with approved organisations (such as regional councils and territorial authorities).

In submitting on this proposal, the NZ Transport Agency is seeking to give effect to this objective.

The NZ Transport Agency wishes the Regional Council to:

1. Retain Policy 5.3.6 in its entirety.
2. Retain Rule 12, but amend it to read "all structures, including coastal protection structures, for drop out repairs of the coastal state highway network, and the associated occupation of space are a controlled activity".
3. Change the incorrect reference in Rule 12 to "Controlled Rule 23".
4. Retain Rule 23, but amend it to read "all structures, including coastal protection structures, for drop out repairs of the coastal state highway network, and the associated occupation of space are a controlled activity".

The NZ Transport Agency does wish to be heard in support of this submission.

Dated at Christchurch this 21 day of March 2016.



Steve Higgs

Planning and Investment Manager - Christchurch

Pursuant to a delegation from
the Chairman and the Board
of the NZ Transport Agency

Address for Service:

NZ Transport Agency
PO Box 1479
CHRISTCHURCH 8140

Attention: James Coutts
Phone: (03) 964 2800
email: james.coutts@nzta.govt.nz