



Submission on the Proposed Regional Coastal Plan

Return your signed submission to the West Coast Regional Council by 5.00pm, Monday 21 March 2016

Submissions may be:

- a) Posted to: Proposed RCP, West Coast Regional Council, PO Box 66, Greymouth 7840
- b) Delivered direct to the West Coast Regional Council at 388 Main South Road, Greymouth
- c) Emailed to rcp@wrc.govt.nz

PART A: Submitter contact details

Public information - all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information. Your information is held and administered by the West Coast Regional Council in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. It is therefore important you let us know if your form includes any information you consider should not be disclosed.

Full name: Katrina Lee

Organisation: Grey District Council

[The organisation that this submission is on behalf of, if applicable]

Postal address: 105 Tainui Street, Greymouth

Post Code: 7805

Email: Katrina.lee@greydc.govt.nz

Phone : 03 769 8607

Phone (Cell):

Preferred method of contact and address for service:

Contact person and address for service [if different from above]:

Only certain people can make submissions. Please tick the option that applies to you:

- I am a person representing a relevant aspect of the public interest
- I am a person who has an interest in the proposal Regional Coastal Plan that is greater than the interest the general public has.
- I am the local authority for the relevant area.

PART B: Trade Competition

As per Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement that:

- a) Adversely affects the environment
- b) Does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

- I **could not** gain an advantage in trade competition through this submission; or
- I **could** gain an advantage in trade competition through this submission. *If you have ticked this box, please select one of the following:*
 - I **am** directly affected by an effect of the subject matter of the submission.
 - I **am not** directly affected by an effect of the subject matter of the submission.

Service of your submission

Please note: any person making a submission must serve a copy of that submission on the original submitter no later than 5 working days after the submission has been provided to the West Coast Regional Council



Signature:

Date/time Submitted: 21 March 2016 – 2.30pm

[Signature of person making the further submission, or authorised to sign on behalf of person making the further submission]

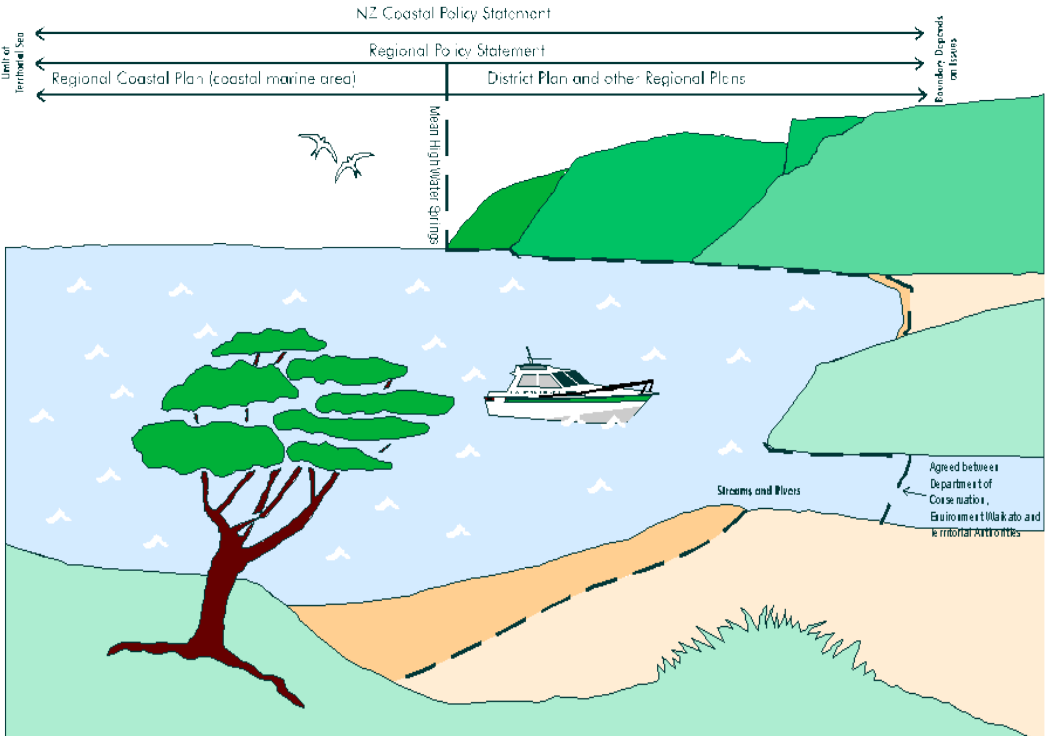
(A signature is not required if you make your submission by electronic means)

PART C: Request to be Heard

- I **do not** wish to be heard in support of my submission; or
- I **do** wish to be heard in support of my submission; and if so,
- I would be prepared to consider presenting my further submission in a joint case with others making a similar further submission at any Hearing.

The specific provisions of the proposal that my submission relates to are:	My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i>	I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i>
Glossary and General		

<p>Glossary – Coastal Environment and general</p>	<p>Oppose</p>	<p>Even though Regional Councils are required by the RMA to prepare a regional plan only for the coastal marine area (CMA) the WCRC could and should opt to meet section 64(2) of the RMA and look at a Coastal Environment Plan which incorporates wider than the CMA and includes landward edge to this (ie it covers wet and dry areas). This would also meet the requirements of the NZCPS.</p> <p>Important values and issues include natural character, significant areas of flora and fauna, natural features and landscapes, cultural values, public access and natural coastal hazards. It would be difficult to effectively manage those qualities which exist within the CMA, in isolation from those existing on the land. Coastal hazards are mostly caused by processes such as erosion, which are generated by the sea, but the effect, especially with sea level rise is nearly always felt on the land.</p> <p>Additionally, given there are limited provisions within the Regional Land and Water Plan and the Regional Policy Statement in relation to the management of the coastal environment on the landward side of the Mean High Water Spring, then it appears there is a policy gap.</p> <p>By restricting the WCRC's attention to issues solely within the CMA would fail to recognise the integrated nature of the coastal environment. Elements and qualities which comprise the coastal environment are inextricably linked, regardless of where they lie in relation to mean high water springs.</p> <p>Further to this submission point it might be worth the WCRC including a diagram in the RCP (Waikato Regional Council has an example – provided below) of how the RCP fits with the other Regional Plans and RPS. Something similar to that on the quality planning website and other Councils with RCP's have them as well. Provides a good overview of how the RCP document fits with other Regional Council documents.</p>
---	---------------	---

<p>The specific provisions of the proposal that my submission relates to are:</p>	<p>My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i></p>	<p>I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i></p>
		 <p>The diagram illustrates the relationship between different levels of coastal planning and the physical coastal environment. At the top, the 'NZ Coastal Policy Statement' is the highest level. Below it is the 'Regional Policy Statement', which is further divided into the 'Regional Coastal Plan (coastal marine area)' and 'District Plan and other Regional Plans'. A vertical line indicates the 'Mean High Water Springs' level. The landscape below shows a coastal area with a tree, a boat, and hills. A note on the right states 'Agreed between Department of Conservation, Environment Waikato and Territorial Authorities'.</p>
<p>Glossary - Regionally significant infrastructure</p>	<p>Support in part</p>	<p>The West Coast Wilderness Trail should be added to “Regionally Significant Infrastructure” definition. Reasons, funded through Government and Local Authority Funding plus others. Recognised by Ministry of Tourism as a nationally significant NZ Cycle Trail and promoted internationally. Is located along the immediate coastal area in places.</p> <p>Amendment Sought: Include the West Coast Wilderness Trail in the list of regionally significant infrastructure.</p>

The specific provisions of the proposal that my submission relates to are:	My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i>	I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i>
Objectives and Policies		
Chapter 3 – Natural and Human Use Values	Support in part	<p>This section should refer to Policy 4 (integration) and 7 (strategic planning) of the NZCPS. The RCP does not refer to these two important policies in the RCP at all. This might be a good place to ensure that the RCP reiterates that there needs to be co-ordinated approach between Councils.</p> <p>It is noted that the RPS refers to Policy 6 but not Policy 4.</p> <p>Under Policy 3.3.6, explanation – this states that only expert investigation is only required for activities in the CHA identified in the RCP. The Grey District Council (GDC) believes that there may be situations where expert reports are required for areas outside the CHA that might pose a potential coastal hazard and this should be catered for in the RCP.</p>
Chapter 4 – Public Access and Occupation of Space	Support in part	<p>Explanation under 4.2 objectives. Should refer to policy 20 (vehicle access) of NZCPS since this section not only relates to walking access but also vehicle as explained in objective 4.2.2.</p> <p>Policy 4.3.1(a) – refers to “reasons in relation to a consented activity” – so what if not consented? People can do what they like?</p>
Chapter 5 – Structures	Support	<p>This section now includes alternatives in relation to soft versus hard engineering protection in a CHA, which the GDC supports.</p>
Chapter 6 – Disturbance extraction/ removal, deposition, reclamation	Support	<p>No comments to make on this section.</p>

The specific provisions of the proposal that my submission relates to are:	My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i>	I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i>
Chapter 7 – Vegetation Removal and Planting	Support in part	<p>7.3 – policy 7.3.1 should ensure that when managing vegetation removal in the CMA, this should include avoiding, remedying, or mitigating adverse effects on the NCA and ONFL. These two key areas of the RCP are not mentioned in some way of protection when vegetation removal is occurring in the CMA.</p> <p>Another significant area is the West Coast Wilderness Trail which has vegetation that needs to be controlled and maintained. There are various groups undertaking plantings adjacent to the trail which will have a positive effect which could be recognised. Need to ensure planting of this area and protection from vegetation removal to ensure that the coastal dune system is not impacted.</p> <p>Amendment Sought: That maintenance, renewal and enhancement of vegetation adjacent to the West Coast Wilderness Trail is permitted.</p>
Chapter 8 – Discharges	Support in part	<p>Typo correction – there are two policy 8.3.3.</p> <p>Support policy 8.4.1 – where District Councils will encourage an assessment of whether centralised sewage effluent treatment and disposal system is appropriate for coastal subdivision and land use. How far from the CMA should subdivisions/land use consent be before the subdivision/land use is considered coastal? Within 100 metres would be where GDC would encourage an assessment.</p> <p>Amendment sought: That an assessment of centralised sewage effluent treatment and disposal systems is required within the CMA and within 100 metres of the CMA.</p>
Chapter 9 – Taking, Use, Damming or Diversion	Support	<p>Under objective 9.2 the explanation, paragraph 2, where it states section 14(1) of the RMA, should this be section 14(2)?</p>

The specific provisions of the proposal that my submission relates to are:	My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i>	I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i>
Chapter 10 – Noise	Support	Policy 10.3.1 – Noise policy has been amended to cater for new standards. The noise levels referred to are L10 - should be Leq
Rules		
Rule 15	Support	Agree that there is an exception to allow for Rule 18.
Rule 18	Support in part	This rule is supported as long as it can be read in conjunction with Rule 19. Gravel and sand as well as debris can block river and creek outlets to the sea so in removing the debris, also need to remove the gravel. If not then Rule 18 needs to be amended to allow for Rule 19 as an exception. Amendment sought: That Rule 19 is an exception to Rule 18 with respect to gravel removal in the CMA.
Schedules		
Schedule 1: Coastal Marine Area Boundaries Across Rivers	Support	No comments to make on this Schedule. Other than there is no list at the beginning of each District like there was in the Coastal Plan 2000 – this was helpful when looking up waterbodies and finding out the description of the CMA boundary.
Schedule 2: Ecological Criteria for Significant Wetlands	Support	GDC wants to ensure that the criteria for wetlands is consistent with the Grey District Plan.

The specific provisions of the proposal that my submission relates to are:	My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i>	I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i>
Schedule 3A: Culturally Significant Areas (CSA)	Support	Support this schedule with no changes.

<p>The specific provisions of the proposal that my submission relates to are:</p>	<p>My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i></p>	<p>I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i></p>
<p>Schedule 3B: Coastal Development Areas (CDA)</p>	<p>Support in part</p>	<p>The Coastal Plan 2000 identified two CDA's in Grey District:</p> <ul style="list-style-type: none"> • CDA2 – Grey River Mouth (navigational channel for commercial port and fishing, boats, breakwaters, river protection works, navigational aid) • CDA 5 – Rapahoe (multipurpose commercial port with recreational facility) <p>The Coastal Plan 2016 identifies three CDA's:</p> <ul style="list-style-type: none"> • CDA4 – Grey River • CDA5 – Grey River Mouth (description hasn't changed from 2000 Plan) • CDA6 – South Beach <p>The development area at Rapahoe must be retained. It is the only significant area along the entire West Coast where there is sufficient deep water, natural shelter from the prevailing wind and swell and proximity to existing infrastructure (state highway and rail). These attributes have been well established through a number of studies by private sector interests. While there is not known to be any current proposals, strategically for the region it is considered important that the option of a Rapahoe Port is retained for the future, as it retains the potential to provide for the region's future needs.</p> <p>This is in the long term plan and the importance of the area as a potential site needs to be retained.</p> <p>For Rapahoe, it is even more important if for instance the Midland Railway line was to close. It could be seen as short sighted to remove CDA5 – Rapahoe.</p> <p>Rapahoe could be viable for safe anchorage for feeder ships to main deep sea ports or it could be for tourist vessels in the future.</p> <p>The requirement to obtain resource consents for CDA5 (Rapahoe) will ensure Part 2 RMA matters are addressed. Additionally one of the implementation methods currently in the Grey District Plan is to “undertake investigations for future port areas such as at Cobden and Rapahoe”.</p> <p>Amendment sought: That the Rapahoe CDA be included in the RCP.</p>

The specific provisions of the proposal that my submission relates to are:	My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i>	I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i>
Schedule 3C: Coastal Hazard Areas (CHA)	Support	Support this schedule with no comments, other than the following wording to Coastal Hazard Area 19 should be added: Amendment sought: CHA19 (South Beach to Cameron's) – further wording to be added to the description of this area. “Settlements (South Beach to Cameron's), natural resources (Paroa Wildlife Management Reserve) and roads (State highway 6, local roads) threatened by river migration, backwater effects, slope failure and wave inundation.”
Schedule 3D: Outstanding Natural Features and Landscape (ONL)	Support	These ONL's are consistent with what is in the Grey District Plan.
Schedule 3E: Outstanding Natural Character Areas (NCA)	Support in part	The following ONL's were identified as outstanding in the Brown report but were not listed in the RCP. GDC believes that they should be included due to their outstanding characteristics and being the backdrop hills behind the CMA they are part of the Coastal Environment and are warranted protection from inappropriate subdivision, use and development under section 6 of the RMA. This would be also consistent with the Grey District Plan. <ul style="list-style-type: none"> • Paparoa Foothills – this area is the backdrop to the coastal environment and therefore is part of the WCRC functions. Refer to Browns Report for reasoning. Amendment sought: That the Paparoa Foothills as outlined in the Browns Report (2013) be added as an NCA.

The specific provisions of the proposal that my submission relates to are:	My submission is that: <i>(support or oppose each separate provision being submitted on, or wish to have amendments made, and the reasons for views)</i>	I seek the following amendments from the West Coast Regional Council: <i>(Give precise details for each provision. The more specific you can be, the easier it will be for the Council to understand your concerns.)</i>
Schedule 3F: Coastal Recreation Areas (CRA)	Support in part	<p>The main CRA that must be added is the West Coast Wilderness Trail. The path itself won't be within the CMA however it is likely to be an interface issue as people will use the pathway as a way of accessing the beach, there will be associated buildings and facilities and maybe future sea protection works will be necessary to protect the pathway. Trail exists between Blaketown and Saltwater Creek (New River) Lagoon. Then along the edge of SH6, then cuts back out near the mouth of the Taramakau River, then back to the Taramakau Bridge.</p> <p>Amendment sought: That the West Coast Wilderness Trail be added as a CRA.</p>
Schedule 9	Support in part	<p>Add in the following watercourses – previously not identified until the time the West Coast Wilderness Trail was constructed.</p> <p>Amendment sought: Add the following watercourses to Schedule 9: (new ones in <i>italics</i>) Westroads Yard (Flower Street Area) Suburbs League Grounds 2X (one on northern boundary, one on South) (Miro Street Area) Watsons Creek Southern end of Domain Terrace (North of Karoro Waste Water Treatment Plant) Mill Creek Jacks Road 2X (one by Jacks Road near camping ground and one opposite Equip Yard) Clough Road New River emergency outlet (may put back in sequence rather than at end of Schedule).</p>