



Further Submission on the Proposed Regional Coastal Plan 2016

Return your signed further submission to the West Coast Regional Council by 5.00pm, Friday 22 July 2016

Further 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@wcr.govt.nz

PART A: Further Submitter contact details

Public information - all information contained in a further 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 – Team Leader – Environmental Planning and Policy, Grey District Council

Organisation: Grey District Council (GDC)

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

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Only certain people can make further 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 proposed policy statement 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 further 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 further submission

Please note: any person making a further 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. If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served on each original submitter.

Please note that this will be completed within 5 working days of further submitting.



Signature:

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

Date: 22 July 2016

(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 further submission; or

I **do** wish to be heard in support of my further 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.

Original submission reference (Number in the Summary of Decisions Requested e.g. GS 3 or 4.56)	Person, or organisation, making original submission	I <u>support</u> or <u>oppose</u> the relief sought in the original submission (please give reasons)
GS 14	Westland District Council (WDC)	<p>GDC <u>supports</u> this submission and relief sought, specifically that the Coastal Plan process should be postponed until the current Proposed Regional Policy Statement (RPS) process is completed.</p> <p>It is noted that there might be timeframes that the Regional Council have in mind but the Regional Council has not clearly communicated these with the submitters and the public therefore the future is unclear how and where these documents sit in the RMA process.</p>
GS 27	Westpower (WESTP)	GDC <u>supports</u> this submission and relief sought, as the overall submission captures that the Coastal Plan should be postponed until the current RPS process is completed, for the reasons outlined in the details of this submission.
1.7	WDC	GDC <u>supports</u> this submission and relief sought, the Coastal Plan should extend to manage the entire Coastal Environment. Accordingly the Coastal Plan should be called the Coastal Environment Plan to be in line with the NZCPS.
3.13	WESTP	GDC <u>supports</u> this submission and relief sought that objective 3.2.3 should refer to protecting significant natural and amenity values.
3.26	Federated Farmers NZ (FFNZ)	<p>GDC <u>opposes</u> this submission and as further submitted on above the Coastal Plan should take into consideration the wider Coastal Environment not just the activities in the CMA.</p> <p>Additionally, oppose the relief sought. The word “protect” needs to remain in here to be consistent with other objectives in this area and to ensure significant natural and</p>

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		<p>amenity values are protected not just where appropriate. These areas and values are significant for a reason therefore these are the next level of protection.</p> <p>Also, “amenity” needs to remain rather than be replaced by “character”. Amenity is defined in the RMA and has a common understanding meaning, whereas “character” is not defined in the RMA. Oppose the deletion of the rest of the sentence of this objective 3.2.3 and the wording should remain as notified in the Coastal Plan.</p>
5.23	WDC	<p>GDC <u>supports</u> this submission and relief sought, that policy 5.3.5 includes the consideration of “<i>assessment of available alternatives to hard protection structures</i>”. The reason GDC supports WDC is that hard protection structures are not always the best option and depends on the coastal processes of the particular coastline that is being referred to. There might be appropriate soft engineering options etc that are practical and the Coastal Plan needs to allow for this alternative option to be investigated. This is a consistent approach policy 25(e) of the NZCPS.</p>
8.12	Kiwirail Holdings Limited (KIWIR)	<p>GDC <u>supports</u> this submission and relief sought that (i) and (j) be added to policy 8.3.2. This allows duration to be taken into consideration and what the purpose is for.</p>
8.30	Te Rūnanga o Ngāi, Te Rūnanga o Makaawhio, and Te Rūnanga o Ngāti Waewae (TRONT)	<p>GDC <u>partly oppose</u> this submission because it is not solely up to the District Councils to assess whether a centralised sewage effluent treatment and disposal system is appropriate through the subdivision. It should also be up to the West Coast Regional Council to take some responsibility over the cumulative effects of effluent on the receiving environment and whether a centralised system is appropriate.</p>
8.31	WDC	<p>GDC <u>supports</u> this submission and relief sought that the other method 8.4.1 needs to refer to the West Coast Regional Council as well rather than fully the District Councils. This means a rule will need to be included in the Coastal Plan and Land</p>

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		and Water Plan setting out when centralised systems will be required due to sensitive receiving environments, high water table or coastal hazard risk. Since discharges to the environment are managed by the Regional Council then there needs to be some sort of assessment completed at the Regional Council end also in relation to cumulative effects of septic tanks in coastal environments.
12.45	WDC	GDC <u>supports</u> this submission and relief sought to amend rules to specifically allow protection works undertaken by the District Councils as well as NZTA in relation to State Highway structures. There are District Council roads in the Grey District that apply including Beach Road, Rapahoe and North Beach Road in Cobden.
12.68	Buller Conservation Group (BCG) and Frida Inta (INTAF)	<p>GDC <u>partly opposes</u> this submission, specifically not allowing clearing the outlet of certain listed rivers/creeks (schedule 9) during the whitebait fishing season and whitebait spawning season. 19(a) and (b) allows for where clearance is needed for flooding of land hazard and removing a hazard but with the inclusion of (i) this could exclude these whitebait times of the year which could have an impact on properties and the general nature of the flow of the river/creek. GDC recommends that the Regional Council does not allow the inclusion of this new condition (i).</p> <p>Additionally, in relation to the extra wording proposed for condition (b) there might be instances where the river/creek post works needs to be wider than the original width. For example if there were obstacles that involved the margins of the creek/river that needed to be removed and this involved changing the channel width.</p>
12.171	Community and Public Health West Coast (CPHWC)	GDC <u>supports</u> this submission and relief sought that the appropriate widely used New Zealand Standards are added into the noise rules. This is consistent with the District Councils District Plan for areas outside the CMA, i.e. adjacent to the coastal environment.

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12.173	New Zealand Defence Force (NZDF)	GDC <u>supports</u> this submission and relief sought that the helicopter landing areas New Zealand Standard (NZS) is inserted into the Coastal Plan. This is consistent with District Councils District Plan. This will assist where there is a proposed helicopter activity that needs a land based resource consent that both Councils are using the same NZS's.
12.175	WESTP	GDC <u>supports</u> this submission and relief sought that the relevant noise and construction noise NZS's are inserted into the Coastal Plan as these impact on adjacent land activities happening under the function of the District Council. It is important that references to these NZS's and documents are consistent between Councils.
13.16	WDC	GDC <u>supports</u> this submission and relief sought that the Regional Council needs to remove the reference to not requiring an engineering design for small scale protection works. There is a concern that if there is not appropriate engineering design completed for small scale or single property protection works could impact on the wider area and potentially impact on an entire bay – for example Rapahoe (which has been identified as a high risk coastal hazard area in the Coastal Plan). Alternatives need to be considered as part of any assessment.
14.5	WDC	GDC <u>supports</u> this submission and relief sought that the financial contribution section of the Coastal Plan still remains until alternatives are assessed through the RMA reform process is confirmed.
16.10	WDC	GDC <u>supports</u> this submission and relief sought that a more detailed definition of Mean High Water Springs is required in conjunction with relevant agencies and experts. The District Plans on the West Coast and Coastal Plan therefore can provide for a consistent definition in their Plans.

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16.12	WESTP	GDC <u>supports</u> this submission and relief sought that a definition for “infrastructure” is required since the Coastal Plan (and other Regional Plans) refer to this word numerous times.