

Submission on application – resource consent or esplanade strip subject to public or limited notification



Form 13

Sections 41D, 95B, 95C, 96, 127(3), 136(4), 137(5)(c), and 234(4), Resource Management Act 1991

Name of submitter

Name(s):

[REDACTED]

Submission on an application

Application from:

Resource # RC14513

Resource consent

A resource consent for:

– Glen Isla Protection Society who are seeking a resource consent for the construction and associated activities for a coastal protection structure(buried rock rip rap wall)

I **am not** a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991.

Submission relates to

Please add additional pages if required.

Use of a hard engineered structure on Council land before adequately considering a soft engineered solution, with a potentially adverse impact on beach amenities and potential adverse effects on other parts of the beach, related to both private properties and Council amenities.

My submission is

include –

- (a) whether you support or oppose the application or specific parts of it;
- (b) whether you are neutral regarding the application or specific parts of it; or
- (c) the reasons for your views.

BPG is neutral in relation to the proposed resource consent application, in so far as it is for the purpose of protecting private property, however we do express concern that there should be further consideration of a soft engineered solution before undertaking a hard engineered structure solution? BPG understands need for coastal protection, but ask whether an independent coastal specialist can provide other more suitable options??

- BPG has concerns regarding ‘the effects’ further along the beach and coastline – both in respect of public reserve/land and beachfront infrastructure; private properties and council amenities. Further BPG notes that history in respect of a rock wall (and previous versions of hard engineered structures adjacent to Shaw Road and the Loop) have resulted in a loss of beach amenities and impacted the beach amenities for adjacent properties. This occurs because natural tidal and storm events tended to erode the adjacent parts of the beach particularly at the ends of the hard structures.
- BPG notes there is no provision in the application for ongoing repair/maintenance to the proposed structure. BPG considers this aspect needs to be specified within the consent. BPG view would be that the Glen Isla property owners/consent holders fund and arrange to ensure sand push up and planting is maintained, so there is no cost placed on the wider beach community and/or ratepayers.
- BPG considers that current beach conditions suggest that a soft engineered option could be more appropriate and environmentally friendly. BPG suggests that a consent for sand push; “controlled activity to avoid disturbing the foreshore and seabed” alongside dune planting with appropriate plants could be more desirable.
- BPG asks whether the proposed buried rock wall, which is currently proposed for council/reserve land can be placed within Glen Isla owners property boundaries with the proposed sand covering and plantings added to this. This would still protect the relevant properties but with less impact on beach amenities.
- BPG notes that the application is for a hard structure – buried rock wall – this is in contradiction to current WBOPDC current coastal erosion policies. (4. General approach to erosion mitigation. 4.1 Council will adopt a precautionary approach... cont).” The application does not explain why a variation to clause 4.1 is appropriate.

I seek the following decision:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought.

BPG requests that the application should be amended to require in the first instance appointment of an independent coastal specialist that could consider and recommend as appropriate other more suitable options.

BPG requests that the application should be amended to require that property owner applicants are responsible for maintenance of any proposed structure, sand covering and dune planting at their cost.

BPG requests that the application should be amended to require that property owner applicants are responsible for the cost of mitigating any adverse effects (caused by any structure ultimately approved in respect of this application) where the adverse effects occur south of the proposed structure, including in the area adjacent to BPG properties.

BPG requests that if, and notwithstanding the above comments a rock wall structure is consented the consent should state that " the proposed rock wall is contained within the Glen Isla applicants property boundaries".

I do not wish to be heard in support of my submission.

*If others make a similar submission, I will consider presenting a joint case with them at the hearing.
(*Delete if you would not consider presenting a joint case).

I request/, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

A copy of this submission must be sent to the applicant/ agent as soon as practicable.

Signature of submitter or person
authorised to sign this form:

*not required if submitting
electronically

Date:

Electronic address for service of
person giving written approval

Phone

Postal address or alternative
method of service

(section 352, Resource Management
Act 1991)

Note to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.

If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a

request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.