

**SUBMISSION TO GDC ON THE APPLICATION FOR RESOURCE CONSENT UNDER  
SECTION 95A OF THE RMA 1991**

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60 Murphy Road, Wainui Beach

**INTRODUCTION:**

I make this submission having read relevant documents. I have lived at the above address for 10 years and spend time on Wainui Beach virtually every day, walking, swimming in the summer and generally enjoying its amenity value.

I have noted impressive sand movements over those 10 years depending on wave and wind influences. In the past 2 years I have been aware that the mean sand level at the bottom of my section has declined; there have been longer periods with no sand cover of the rocks and when sand returns it does not reach the depth previously achieved (photograph 1) and the sand level has not been stable. I assume this is due to changes in climate, storm frequency and some small rise in sea level. Sand movement is rapid – a metre or more can disappear overnight, and then return gradually over days or weeks.



*Photograph 1: Steps 60 Murphy Rd, 7.8.2017. This shows the usual level of sand accumulation in the past 2 years. The arrow indicates the approximate level of usual sand accumulation pre-2015.*

When sand levels are low the vertical rail irons are exposed to a greater or lesser extent and provide ideal implements for bruised shins, stubbed toes and tripping. They are also unsightly, see photograph 2.



*Photograph 2: Sea frontage 60 Murphy Rd, 7.8.2017 showing the rail irons emerging when the sand level is low.*

NZ Coastal Policy Statement (2010) (NZCS) emphasises minimising or avoiding the dangerous effects of human activity on coastal environments, and is a guide to local planning and consent processes. I note Policy 3:

***Policy 3 Precautionary approach***

*(1) Adopt a precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse.*

*(2) In particular, adopt a precautionary approach to use and management of coastal resources potentially vulnerable to effects from climate change, so that:*

*(a) avoidable social and economic loss and harm to communities does not occur;*

*(b) natural adjustments for coastal processes, natural defences, ecosystems, habitat and species are allowed to occur; and*

*(c) the natural character, public access, amenity and other values of the coastal environment meet the needs of future generations.*

## **CLEARLY STATE WHICH PARTS OF THE APPLICATION YOU SUPPORT OR OPPOSE OR WISH TO HAVE AMENDED:**

- Rock revetment at Tuahine Crescent – OPPOSE – or if that is lost, AMEND.
- Sand push-ups all whole beach – OPPOSE
- Removal of emergency work at 21 Wairere Road - SUPPORT

**NOTE:** I was one of the objectors to the proposed rock revetment from the groyne to Wainui creek in 2009, an application which was refused consent by independent Commissioners. They concluded that that proposal did not put sufficient weight on the revetment's effect on the natural character of the beach, the amenity value of the beach and on public access to the beach. This current proposal also ignores all of those values.

I object to any new rocks on the Beach. If the proposal for a new revetment at Tuahine Cres is consented, then the rocks should terminate at the Tuahine steps, NOT north of them.

Whether or not the revetment is consented, I support the removal of the logs and rails. This removal should NOT end with the steps; all unsightly and hazardous materials should be removed, and the rocks allowed to remain in situ.

## **REASONS FOR OPPOSITION:**

### Rock revetment – Tuahine Crescent.

1. The use of hard structures for beach protection are not supported by the NZCPS and are at the bottom of the hierarchy of protection methods proposed by the WBEMS 2014, p 10.
2. There is a long history of such structures being built on Wainui Beach, which is now littered with their remains.
3. There is little detail of the design and no detail of the ends and tie-in of the revetment. The likely consequence is the diversion of wave energy and of the erosion problem elsewhere. Observation of the revetment south of the groyne shows that directly beyond the revetment erosion is increased with severe weakening and loss of the bank.
4. While I sympathise with those who see their property at risk of erosion I do not see the point of moving the jeopardy to other properties.

5. There is no indication that all unintended consequences of the revetment have been identified and mitigated.
6. The proposed revetment would extend at least 3 m beyond the present rocks, contrary to the Wainui Beach Erosion Management Strategy (WBEMS) which indicates that any such structure should have the same foot print as the present rocks. This would significantly reduce beach width and reduce access to the southern region. The amenity value of this southern part of the beach is high and is used a lot for fishing, collecting kai moana, exploring rock pools, picnicking, walking and visiting the old light house.
7. The proposal does not address the amenity value of the beach and concentrates solely on property protection.
8. There is no logic to extending the proposed revetment beyond the present Tuahine Crescent steps: Area 2 is defined as the " existing rock wall and groyne and extends northwards to include the public beach access way from Tuahine Crescent" (WBEMS p14).
9. There is no erosion evident in the area directly north of the Tuahine Cres steps; vegetation is flourishing on this bank, a feature used in the WBEMS paper to indicate stability.
- 10 There is little consideration for public access to the beach. There are no design details of a new access way from Tuahine Crescent. If the rocks are to extend at least 3 metres beyond the present rocks, and the access way was to be built over the rocks, then the steps would be under water most of the time and therefore of little utility.
- 11 There is no mention of the environmental impact of this proposal.
- 12 There is no indication that the effect of sea level rise consequent upon climate change has been factored into the viability and utility of this proposal.
- 13 The proposed works are expected to take 20 weeks, with access available at low tide. As there is low tide at some part of every day, we could expect heavy machinery and trucks on and traversing the beach at some parts of most working days – that means up to 100 days of marked reduction in the amenity value of the beach.

Log and rail-iron removal:

I do not object to this proposal, but if some are removed then all should be removed. The rail-irons extend north to beyond my property frontage, where they serve absolutely no purpose as there are no logs remaining, and the irons are quite unrelated to the rocks. They stick up during low sand periods and are both hazardous and unsightly, see photograph 2.

If any are to be removed from the area where the new rocks are proposed, then all should be removed. I would expect this could be achieved while allowing the rocks already present to remain in situ.

Sand push up:

I object to this unnatural process.

Sand movement is a natural phenomenon and occurs continuously on this dynamic beach. This is one of the "natural adjustment" that the NZCPS envisages (Policy 3). There is no certainty that pushed-up sand will remain pushed up in the next storm or change of wave pattern, any more than naturally deposited sand will remain. It will be costly and ultimately pointless. The proposed push ups extend along the whole beach, but the engineer at the open day (Surf Club) said that they would not happen at the southern end of the beach where there are no sand dunes.

See photographs 3 & 4 for changes in sand level over a period of under 2 weeks, at the frontage of my property.

Gabion baskets at 21 Wairere Rd.

I support the retrospective consent for these.

I support the removal of the rocks above them.