

Submission on Resource Consent Applications to build a Breakwater and conduct land reclamation at Westshore City Reef

To: Andrew Newman
C/o – Consents
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Full name: _____

Postal address: _____ Post code _____

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Application : Name of applicant: Napier City Council

Consent Number(s) Submitted on:

CL130253R, CL130254M, CL130255M, CL130257C, CL130258O, CL1302589D

Consent Activity:

To construct, repair and maintain a rock coastal protection structure (breakwater) and to undertake a reclamation within the Coastal Marine Area (CMA), and to undertake associated construction activities, being to disturb, excavate, and deposit materials within the CMA, and to subsequently occupy space within the CMA with the structure and reclamation.

Location:

Within the Coastal Marine Area, north of and adjacent to Napier City Council Public Reserve (Lot 21 DP 2165) and 1 - 23 Whakarire Avenue, Westshore, Napier.

I/We oppose the above application



My submission is opposed to the application for the following reasons:

The applicant (Napier City Council) in its consent application page 17 states that:
“Some effects on the surfing wave are expected to occur, primarily due to residual wave reflections off the structure, presenting as backwash on the inside section of both the left and right hand rides and a degree of wave crest interference on the outer section at the takeoff location. The modelling indicates the interference is only minor and the integrity of the surfing wave is not compromised.”

The proposed break water will eliminate the inside “nursery” Surfbreak, an important surfbreak for young children and learners, as well as significantly affect at least, the left hand surfing wave,

I do not consider this a minor effect.

The surfing reef is an important inner city natural recreational amenity that is easily accessible by young and old, the inner nursery surfbreaks are significantly important for future generations of surfers. This fact was noted during the NZCPS-2008-board-of-inquiry-vol-2 for the 2010 New Zealand Coastal Policy Statement(NZCPS), in that adverse effects on such surfbreaks should be avoided.

The proposal is also inconsistent with policies: 1, 2, 3, 4, 6, 13, 15 and 21; of the NZCPS

I assert that Napier City Council does not fully appreciate or lend weight to the NZCPS;

Policy 13 Preservation of natural character

(2) Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:

(c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

The proposed breakwater does not “**avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment**” as required by The New Zealand Coastal Policy statement (policy 15).

Councils and consenting authorities must give effect to the New Zealand Coastal Policy statement 2010.

The consent application itself asserts that “The area is much modified and bears little, if any, resemblance to a ‘natural’ state. “ This is not true with reference to the surfing reef as it has not yet had any modification.

In my view, other options that have lesser or no impact on the surfing reef have not been given adequate weight with regard to the NZCPS

The consent application is also inconsistent with the RMA that are also applicable to surfbreaks and their protection, such as Part 2 (section 5 – 8) where section 5 states to promote "the sustainable management of natural and physical resources"(including 5 (2)(a); 6 (a) natural character of the coastal environment; and observance of (c), s. Also with regard to the RMA section7 (c), the maintenance and enhancement of amenity values (f), maintenance and enhancement of the quality of the environment, and (g) any finite characteristics of natural and physical resources.

Further Comment: (add more pages if needed)

I wish to be heard in my submission Yes No

I wish to attend any pre-hearing meeting that may be convened Yes No

Signature of submitter: _____

(or person authorised to sign on behalf of submitter)

Date: _____