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20 September 2024

Hearing Evidence – proposed TTPP  
C/o West Coast Regional Council  
P O Box 66  
**Greymouth 7840**

To whom it may concern

**WCRC written evidence for TTPP Hearing – High Coastal Natural Character Overlay**

The West Coast Regional Council (WCRC or the Council) does not wish to appear before the proposed TTPP Hearing Panel on our submission point on the High Coastal Natural Character Overlay. However, we wish to submit written evidence.

The Council's evidence is attached.

Our contact details for service are:

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We would be grateful for acknowledgement of receipt of our written evidence.

Yours faithfully

Max Dickens  
**Manager Policy**

## West Coast Regional Council Written Evidence on TPP High Coastal Natural Character Overlay

### Background

The West Coast Regional Council (the Council) made submission point S488.010 seeking that the TPP High Coastal Natural Character (HCNC) Overlay be removed from small areas of modified land in three areas: Karamea River (west end of Karamea Domain stopbank), Kongahu (Granite Creek) and Mokihinui (adjoining the downstream end of the bay).

Council's submission did not include maps showing the specific parts of the Overlay that are sought to be removed. This made it difficult for the s42A Report to recommend whether to accept, accept in part or reject the Council's submission point.

### Changes to High Coastal Natural Character Overlay

Appendix 1 of this evidence has six maps, two for each of the three areas where the HCNC Overlay extends onto modified land. For each of the three areas, there is the TPP Overlay map showing the HCNC area, and an aerial map showing locations of WCRC's Rating Districts' natural hazard structures, and other development within the HCNC area. The aerial maps 2, 4 and 6 are Arc maps taken in 2015/16.

The three areas where the Council seeks the removal of the HCNC Overlay are modified in the following ways:

#### Karamea River by township:

Map 2 shows where the Rating District stopbanks and rock protection are along the true right bank of the Karamea River, and on the true left bank further upstream. This infrastructure has the HCNC Overlay over it as seen in Map 1. The protection works are to avoid or mitigate flooding of the settlement and farmland. These Rating District structures are existing Regionally Significant Infrastructure, and were lawfully established before the TPP was publicly notified.

The Council is renewing its Floodwall Protection Bylaw which does not allow planting on the stopbanks (other than pasture grass), as tree and bush roots can make the protection structure unstable and potentially fail to provide protection for the community. This means that the natural character of the river banks in these places is not likely to be restored.

Additionally, resource consents have been granted for gravel extraction from the larger gravel bed on the bend in the River, which is also within the HCNC Overlay. Removal of gravel assists with reducing the risk of harm from flooding, by stopping the River bed from building up and potentially exacerbating flooding of adjoining land.

The Overlay also extends into adjoining farmland, a camping ground and marginally into a residential property. These land uses in the river margins have made the land very modified, and there is very little remaining natural character.

Council seeks removal of the HCNC Overlay from:

- No #5 to Point C on the true left bank in Map 2; and
- The eastern end of the orange line showing the rock protection work, to the western end of the rock protection work, on the true right bank in Map 2.

#### Granite Creek at Kongahu:

Maps 3 and 4 show the HCNC Overlay over the Creek bed and its margins upstream of the road bridge, and within the Otumahana Estuary. Map 4 shows the two areas adjoining the right bank of the Creek channel where the slip debris and gravel is placed when it is removed from the Creek and Estuary. Willows are also occasionally cleared from the Creek margins.

The clearance is necessary due to a landslide in the inland hills which has created an ongoing plug of debris coming down Granite Creek. The debris, and natural gravel movement downstream, raises the Creek bed upstream of the only road in and out of Karamea, and also raises the bed of the Otumahana Estuary. The raised Creek and Estuary beds then contribute to flooding of adjacent land and the road in weather events. The local Rating District has held a resource consent for a number of years before the TTPP was publicly notified, to occasionally clear the debris from the Creek bed upstream of the road bridge, and within the Estuary where the Creek channel lies.

Because of the clearance work involved with removing slip debris and gravel, and exotic plants, the Creek's margins have been modified in the area covered by the Overlay. There is also an unsealed access road upstream of the bridge, parallel to the true right bank of Granite Creek which DOC, the Council and contractors use to monitor and clear debris and gravel.

Council seeks that the HCNC Overlay be removed from:

- The Granite Creek bed and margins where the debris and gravel are removed from, and willow are cleared, from the sealed road bridge upstream to the upstream extent of the Overlay;
- The two debris and gravel stockpile sites;
- The main road and bridge;
- The unsealed access road near the true right bank.

Mokihinui River bank:

Maps 5 and 6 show that small areas of the HCNC Overlay include, from downstream to upstream:

- a residential property on the corner of Rawson and Burnett Streets with adjoining Rating District stopbank next to the River,
- Rating District culverts and rock work at Nos #3-#5 in the vicinity of the residential property,
- an old groyne extending into the River at No #7,
- and a hardfill and dump site in a bush area near the landward end of the No #7 old groyne.

Map 5 also shows a small area of the Overlay further upstream on the true left side of the River, which covers the main road and vegetation in the river margin, in an unusual shape. This appears to be a mapping error, as the strip of river margin vegetation downstream is not in the HCNC Overlay.

Council seeks that the HCNC Overlay be removed from these modified areas.

**Appendix 1: Maps showing locations of the 3 areas where the High Coastal Natural Character Overlay is sought to be removed**

**Map 1: Banks of Karamea River by township area, with High Coastal Natural Character area in orange hatch**



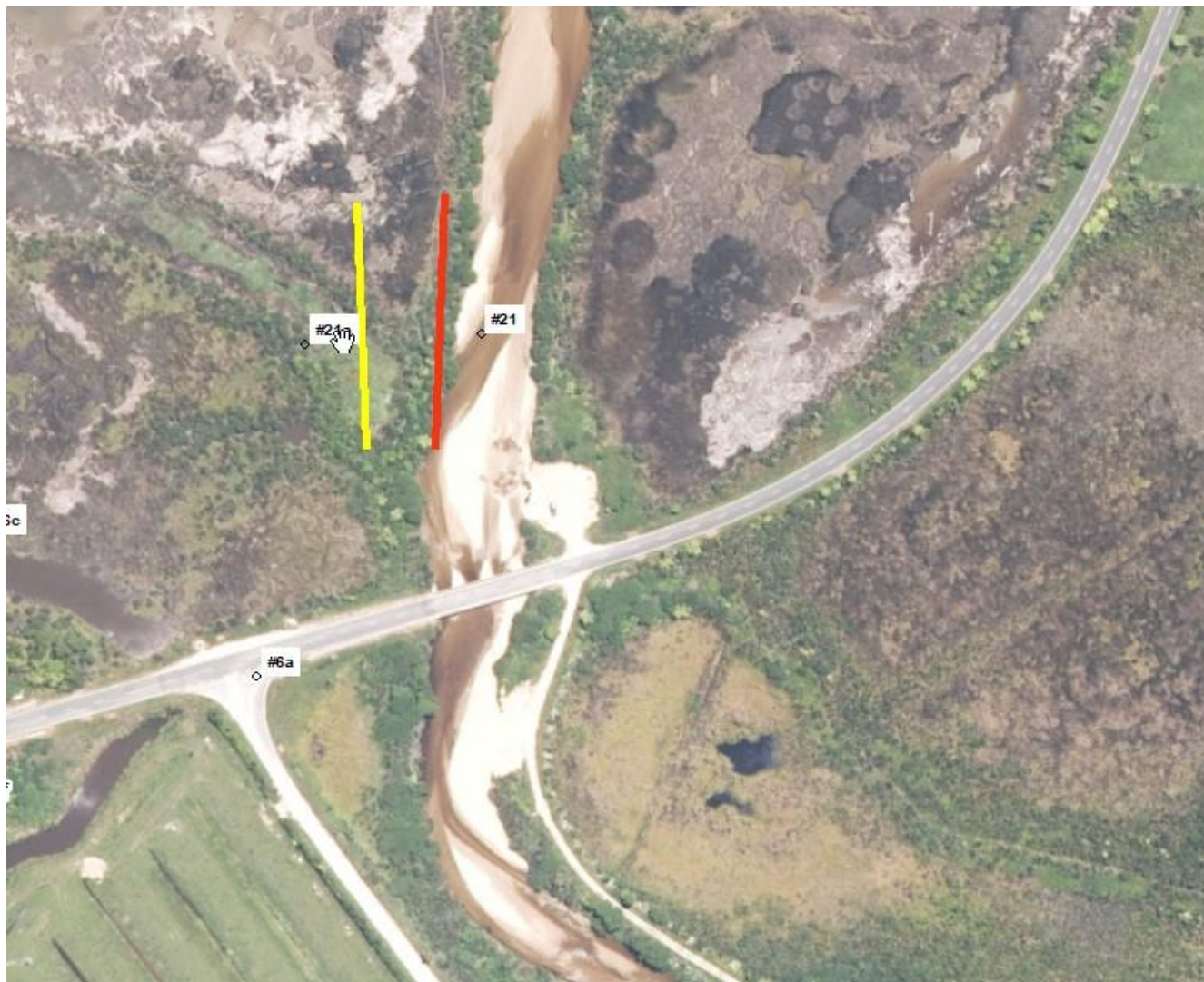
Map 2: Banks of Karamea River by township area, with Rating District stopbanks in yellow, and rock protection in red



**Map 3: Downstream end of Granite Creek entering Otumahana Estuary at the road bridge, with High Coastal Natural Character overlay in orange hatch**



**Map 4: Gravel and slip debris extraction areas on true right bank of Granite Creek, upstream of, and within, the Otumahana Estuary**





**Map 5: High Coastal Natural Character overlay in orange hatch, over 3 small parts of the south bank of the Mohikinui River, just upstream from the mouth**



Map 6: Rating District stopbank (yellow line), culverts and rock work at Nos #3-#5, old groyne at No #7, and hardfill and dump site at bush area near landward end of old groyne - south bank of the Mohikinui River

