

Resource Consent

RESOURCE MANAGEMENT ACT 1991

Section 127 Change or cancellation of conditions

Consent No.	WAR090322	
Consent ID(s)	[40254] (new) [27566] (old) Coastal permit – occupation	
	[40255] (new) [27567] (old) Coastal permit – reclamation	
	[40256] (new) [27568] (old) Coastal permit – disturbance	
	[40257] (new) [27569] (old) Coastal permit – general structure	
	[40258] (new) [27570] (old) Coastal permit	
	Name	South Wairarapa District Council
Address	P.O. Box 6, Martinborough 5741	
Duration of consent	Original commencement date: 20 March 2012	Variation effective: 4 March 2026
	Lapses: consent given effect to	Expires: 30 September 2046
Purpose for which consent(s) is granted	To change conditions 1 and 6, and add conditions 10A-10L, to provide for the construction of seawalls along Cape Palliser Road, including associated occupation, reclamation, disturbance, and placement of structures in the coastal marine area.	
Location	The coastal marine area adjacent to Cape Palliser Road, from Hurupi Stream to the Cape Palliser Lighthouse at or about map reference from NZTM 1785111 – 5409875 (Hurupi Stream end) to NZTM 1791753 - 5390861 (lighthouse end)	
Legal description of land	Various locations along the Palliser Bay coastline	
Conditions	See below	

Decision approved by:	Richard Percy	Team Leader, Environmental Regulation	
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Consent conditions WAR090322

Note: Changes to these conditions have been made under s127 of the Resource Management Act 1991. Wording removed indicated by ~~strike through~~ and wording added indicated by **bold underline**.

Conditions to resource consent WAR090322 [37225]

Administrative

1. The location, design, implementation and operation of the physical works shall be in general accordance with the consent application and its associated plans and documents lodged with the Wellington Regional Council on 27 April 2009, and the amended application dated 17 September 2010, **and further information received on:**
 - **The application to change conditions of consent under s127 of the RMA, its associated plans and documents lodged with the Wellington Regional Council (s127 application) received on 23 September 2025, and further information supplied including:**
 - **Resource Consent Application to Vary WAR090322 to enable EcoReef to replace Boulder Beaches in three locations and appendices, dated September 2025**
 - **Landscape and Visual Effects Assessment and appendices, dated December 2025**
 - **Updates to the Landscape and Visual Effects Assessment and appendices received 16 January 2026¹**

For the avoidance of doubt, where information contained in the application is contrary to conditions of this permit, the conditions shall prevail.

Where there may be contradiction or inconsistencies between the application and further information provided by the applicant, the most recent information applies. In addition, where there may be inconsistencies between information provided by the applicant and conditions of the consent, the conditions apply.

Note: Any change from the location, design concepts and parameters, implementation and/or operation may require a new resource consent or a change of consent conditions pursuant to section 127 of the Resource Management Act 1991.

2. The Manager, Environmental Regulation, Wellington Regional Council, shall be given a minimum of two working days (48 hours) notice prior to the works commencing.

Note: Notifications can be emailed to notifications@gw.govt.nz. Please include the consent reference WAR090322 and the name and phone number of a contact person responsible for the proposed works.

3. The consent holder shall provide a copy of this consent and any documents and plans referred to in this consent to each operator or contractor undertaking works authorised by this consent, prior to the works commencing.

¹ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

Note: It is recommended that the contractors be verbally briefed on the requirements of the conditions of this consent prior to works commencing.

4. The consent holder shall ensure that a copy of this consent and all documents and plans referred to in this consent, are kept on site at all times and presented to any Wellington Regional Council officer on request.
5. All works, including tidy up on completion of the works, shall be completed to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.
6. The management of activities and their effects will be carried out according to three defined zones as defined by this consent **and s127 application received on 23 September 2025:**
 - Immediate Works Zones – where hard defence works may be constructed according to the process set out in condition 8
 - Active Management Zones – where boulder beaches may be constructed and / or a range of management techniques will be used, according to the process set out in condition 9.
 - **EcoReef Sites – meaning areas where EcoReef seawalls may be placed, identified as “Pinnacles – Johnsons Hill North”, “Te Kopi – Johnsons Hill South”, “Whatarangi/Buckleys Beach” and “Turners Bay” in the document *Cape Palliser EcoReef Sites Scaled Location Plans (EcoReef, 16 January 2026), in accordance with all conditions to consent except for Conditions 9 and 10.***
 - No Go Zones – where no work will be undertaken.

The ‘Immediate Works’, ‘Active Management’ and ‘No Go’ Zones are identified on the ‘Priority Rating’ Maps 1-10, submitted to Wellington Regional Council on 17 September 2010 as part of the WAR090322 section 92 RMA response.²

Management Plans

7. The consent holder shall prepare, submit and implement a site-wide Environmental Management Plan (EMP) for all construction works authorised by this consent to the Manager, Environmental Regulation, Wellington Regional Council, for approval at least 20 working days prior to works commencing. The EMP shall include, but not be limited to:
 - roles and responsibilities, including appointment of a representative to be the primary contact person in regard to matters relating to this consent
 - overview of operations, including notifications, operating hours, erosion and sediment control principles, general construction methodologies, dust control, condition and operation of machinery, noise control; and, site tidy up
 - recording, reporting and inspections, including consent availability, incidents; and, complaint management
 - site safety, and
 - contingencies, including discovery of archaeological sites, discharges of contaminants to water, land and air; noise, mud of roads; and reviews

² Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

Note: The EMP provides an umbrella document that identifies the management processes and techniques to ensure appropriate environmental management of the site. The EMP's (IWZSEMP and AMZSEMP set out below) are undertaken in general accordance with the procedures outlined in the EMP.

8. Prior to any work occurring in the **Immediate Works Zones**, the following information shall be submitted to the Manager, Environmental Regulation, Wellington Regional Council, 10 days prior to the commencement of construction:
- An Intermediate Works Zone Site Environmental Management Plan (IWZSEMP), which shall be in general accordance with the EMP. The IWZSEMP shall include, but not be limited to:
 - a detailed design and construction methodology for the works including measures to control traffic, ensure public safety and provision for public access,
 - an erosion and sediment control plan;
 - confirmation of outcomes with stakeholders;
 - notification of operator or contractor appointed to carry out the works authorised by this consent including the contractor's company;
 - address, named representative and their contact details; and,
 - a detailed schedule of construction activities including the expected commencement date and duration of works in each location within the area.

The consent holder shall prepare the IWZSEMP using the following steps:

- **Step One:** The consent holder will notify the Manager, Environmental Regulation, Wellington Regional Council of the area and extent where boulder beaches are **necessary, and of the intention to prepare a IWZSEMP for works to occur;**
 - **Step Two:** The consent holder will consult with Rangitane o Wairarapa and Kahungunu ki Wairarapa, Forest and Bird and the New Zealand Historic Places Trust, in the preparation of the IWZSEMP and confirm what mitigation measures of other actions have been taken to address any concerns raised. Consultation shall include the offer of a direct meeting between the above-mentioned persons to discuss the proposed works. The SEMP shall confirm what mitigation measures or other actions shall be or have been taken to address any concerns raised.
 - **Step Three:** The consent holder shall submit the IWZSEMP to the Manager Environmental Regulation, Wellington Regional Council for approval no less than 10 working days before works are to commence. Works shall not proceed until approval is provided.
 - **Step Four:** 48 hours before commencing works, the consent holder will notify Rangitane o Wairarapa and Kahungunu ki Wairarapa, Department of Conservation, Forest and Bird and the New Zealand Historic Places Trust and residents within 50m of the proposed working area.
- Specific engineering designs of the hard defence works to be constructed.

- Specific investigations of any site specific environmental concerns that may arise as requested by the Manager, Environmental Regulation, Wellington Regional Council, or through consultation with stakeholders, including:
 - An archaeological assessment,
 - An ecological assessment;
 - A cultural assessment;
 - An assessment of impacts on coastal processes or river hydrology; and,
 - An assessment of the impact of sea level rise or other changes in natural hazard risks.
9. Prior to any work occurring in the **Active Management Zones**, the following information shall be submitted to the Manager, Environmental Regulation, Wellington Regional Council, no less than 10 working days prior to the commencement of construction:
- **Step One:** A brief written assessment of each option below for managing coastal protection shall be undertaken. The assessment shall take into account coastal processes, past works completed and monitored under this consent, public access requirements and the ecological, cultural, archaeological values of the site. All of the following options shall be assessed before the consent holder confirms what it considers to be the most appropriate option:
 - 'Soft defence works'; such as dune re-shaping and re-vegetation;
 - 'Hard defence works' as enabled under this consent; and,
 - Relocation of Cape Palliser Road.
 - **Step Two:** The consent holder will consult with Rangitane o Wairarapa and Kahungunu ki Wairarapa, Department of Conservation, Forest and Bird and the New Zealand Historic Places Trust and confirm what investigations, mitigations measures or other actions are appropriate to address concerns raised;
 - **Step Three:** The consent holder shall inform the Manager, Environmental Regulation Wellington Regional Council of the outcome of steps one and two. The Manager, Environmental Regulation, Wellington Regional Council shall confirm the option for managing coastal protection, need to undertake investigations, implement mitigation measures or other actions.
 - **Step Four:** An Active Management Zone Site Environmental Management Plan (AMZSEMP) shall be submitted to and approved by the Manager, Environmental Regulation, Wellington Regional Council. The AMZSEMP shall include:
 - a design overview and construction methodology for the works;
 - notification of operator or contractor appointed to carry out the works authorised by this consent
 - including the contractor's company,
 - address, named representative and their contact details; and,
 - the expected commencement date and duration of works.
 - **Step Five:** Where, following step one, a decision is made to construct 'hard defence works', the same process for approval of a IMZSEMP as described in Condition [8] shall apply prior to those works occurring (except that the stakeholder engagement

shall be deemed to have occurred). Where relocation of the road is required, further resources consents may be required depending on location.

- **Step Six:** 48 hours before commencing works, the consent holder will notify Rangitane o Wairarapa and Kahungunu ki Wairarapa, Department of Conservation, Forest and Bird and the New Zealand Historic Places Trust and residents within 50m of the proposed works.

Note: an AMZSEMP may be for specific construction areas or for extended areas within the Zone.

EcoReef Detailed Design

10A. The consent holder shall submit a detailed design for each EcoReef structure at each EcoReef Site at least 20 working days prior to the proposed date of commencement of works at each EcoReef Site. The detailed design shall be prepared and certified by a suitably qualified and experienced Chartered Professional Engineer.

The detailed design shall demonstrate that the final design of each EcoReef structure is in accordance with the conditions of this consent, and include (but not be limited to) the following:

- a) **Drawings, including plans, elevations, cross sections, and details showing the final design of each EcoReef structure;**
- b) **Description of how and where public access will be integrated into the design of each EcoReef structure;**
- c) **Description of how each EcoReef structure will integrate with any adjacent bridges or culverts;**
- d) **Description of how the ends of each EcoReef will integrate with adjacent existing foreshore and seabed or adjacent existing rock revetment structures;**
- e) **In relation to the “Te Kopi – Johnsons Hill South” EcoReef Site:**
 - i. **Drawings that demonstrate that the final design of the structure has minimised the visibility of the structure from the road to the greatest extent practicable;**
 - ii. **Drawings that illustrate how the final design of the structure will integrate with the prominent landform located on the northern side of the northern stream mouth, without bisecting the landform.³**

10B. The consent holder shall construct each EcoReef structure in accordance with the detailed design for each structure submitted to the Manager under Condition 10A.⁴

³ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

⁴ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

EcoReef Construction Environmental Management Plan

10C. At least 20 working days prior to the commencement of construction at each EcoReef Site, the consent holder shall submit a EcoReef Construction Environmental Management Plan to the Manager for certification. The CEMP shall be prepared by a suitably qualified and experienced person, in consultation with the contractor, and shall include:

- a) **Responsibilities and contact details of all parties responsible for the construction of the EcoReef structure;**
- b) **Identification of the area of foreshore and seabed within the coastal marine area, and land adjacent to the coastal marine area, that will be disturbed during the construction works;**
- c) **Construction methodology and programme;**
- d) **Methods of construction access that will minimise disturbance of the foreshore and seabed;**
- e) **Identification of erosion and sediment control measures that will be implemented to minimise the discharge of sediment from construction works to the coastal marine area;**
- f) **Details of processes/measures to be put in place to prevent the discharge/spillage of oil, grout, cement and other contaminants to the coastal marine area;**
- g) **Procedures to be undertaken in the event of a discharge/spillage of oil, grout, cement and other contaminants to the coastal marine area;**
- h) **Methods that will be used to temporarily exclude public access to the work site during construction.**⁵

10D. Works shall not commence at any EcoReef Site until the consent holder has received notice in writing that the CEMP for that site has been certified by the Manager.⁶

10E. The consent holder shall undertake all works in accordance with the certified CEMP for that site.⁷

EcoReef Landscape Management Plan

10F. At least 20 working days prior to submission of the Landscape Management Plan under Condition 10G, the consent holder must provide a draft version of the plan to Ngāti Kahungunu ki Wairarapa Charitable Trust, Kahungunu ki Wairarapa Tāmiki Nui a Rua, and Rangitāne o Wairarapa Inc., and invite Ngāti Kahungunu ki Wairarapa Charitable Trust, Kahungunu ki Wairarapa Tāmiki Nui a Rua, and Rangitāne o Wairarapa Inc. to comment on these draft versions.⁸

⁵ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

⁶ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

⁷ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

⁸ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

Note: If Ngāti Kahungunu ki Wairarapa Charitable Trust, Kahungunu ki Wairarapa Tāmiki Nui a Rua, and/or Rangitāne o Wairarapa Inc. choose to not be involved in the development of management plans, and/or if no response is received 10 working days after receipt of the invitation, the consent holder will have complied with this consent.

Note: Mana whenua can be contacted at the following addresses:

- **Ngāti Kahungunu ki Wairarapa Charitable Trust:**
mariana@kahungunuwairarapa.iwi.nz
- **Kahungunu ki Wairarapa Tāmiki Nui a Rua: resource.consent@kkwtmr.org.nz**
- **Rangitāne o Wairarapa Inc.: taiao@rangitane.iwi.nz**

10G. The consent holder shall submit a Landscape Management Plan (LMP) for the “Pinnacles – Johnsons Hill North” and “Te Kopi – Johnsons Hill South” EcoReef Sites at least 20 working days prior to the proposed date of commencement of works authorised by this consent at those sites.

The purpose of the LMP is to demonstrate the measures, procedures, and methodologies that will be put in place to manage the actual and potential effects on landscape and natural character resulting from construction of EcoReef structures over the life of the structures. The scope of the LMP is the area where each EcoReef structure will be placed.

The LMP shall be prepared by a suitably qualified and experienced person and shall be in accordance with the revised Landscape and Visual Effects Assessment RFI Revision December 2025 (Landscape & Visual Effects Assessment Cape Palliser Coastal Protection (Revised Draft 22 December 2025).pdf) submitted with the application and further information received 22 December 2025 and 16 January 2026.

The LMP shall include (but not be limited to) the following information, plans, and details:

- a) **Details on how any feedback received from parties under Condition 10F has been incorporated into the LMP;**
- b) **Delineation of the area the LMP relates to;**
- c) **Details of indigenous planting in and adjacent to each EcoReef structure, including a programme/timeframe to ensure plant success rate of at least 80% take is achieved within 5 years of planting;**
- d) **A plan demonstrating the location, lengths, widths, and areas where the required planting is to be implemented, including fencing if proposed;**
- e) **A detailed planting plan prepared by a suitably qualified person, including, but not limited to, details of plant species, size, grade, density, number and relative composition;**
- f) **Details of eco-sourcing (plants that have been sourced and propagated from the Wellington Ecological District) and how plants are appropriate for the location; and**

- g) **Details of, and a programme for, maintenance, monitoring, and measuring success of the required planting for a minimum period of five years:**
1. **The specific targets, timeframes, methodologies and measures/criteria to determine the success of the wetland planting;**
 2. **Measures outlining how the legal and physical protection of the mitigation planting will be achieved in perpetuity;**
 3. **Details of the on-going maintenance of the planting including, but not limited to, the replacement of plants, future management, and control of pest plants; and**
 4. **Details of how plants will be protected from pest animals.**

10H. No works at the “Pinnacles – Johnsons Hill North” and “Te Kopi – Johnsons Hill South” EcoReef Sites shall commence until the consent holder has received notice in writing that the LMP has been certified by the Manager.⁹

10I. The consent holder shall undertake all works at the “Pinnacles – Johnsons Hill North” and “Te Kopi – Johnsons Hill South” EcoReef Sites in accordance with the certified LMP.¹⁰

EcoReef Renourishment

10J. No later than 20 working days after the completion of construction at each EcoReef Site, the consent holder shall submit a Renourishment Plan to the Manager for certification. The purpose of the Renourishment Plan is to ensure edge protection of the EcoReef structures is adequate and that any erosion of the foreshore and seabed adjacent to the EcoReef structures is adequately remediated.

The Renourishment Plan shall be prepared by a suitably qualified and experienced person and shall include:

- a) **Circumstances under which renourishment will be required to mitigate end effects associated with potential outflanking, and/or effects on the foreshore after weather events;**
- b) **Trigger levels for renourishment at each location;**
- c) **Methodologies for placement of renourishment material that minimise the disturbance of habitats of indigenous flora and fauna;**
- d) **A plan for deposition of renourishment material, including identification of areas to be avoided including outfalls, and stream mouths;**

⁹ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

¹⁰ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

- e) **The name and location of the sediment source for renourishment material, including confirmation that the material is free of any organic matter or contaminants;**
- f) **Details on sediment source composition of renourishment material and demonstration sediment is of a similar composition to the in-situ material within the foreshore and seabed and will maintain the existing profile.**

Advice note: after the first Renourishment Plan has been certified, renourishment plans for subsequent sites may be provided as an amendment to the first certified Renourishment Plan. ¹¹

10K. The consent holder shall monitor and undertake renourishment of the foreshore and seabed adjacent to each EcoReef structure in accordance with the certified Renourishment Plan for the duration of the consent. ¹²

Amendments to EcoReef management plans

10L. The consent holder may request amendments to the EcoReef Construction Environmental Management Plan, EcoReef Landscape Management Plan, or Renourishment Plan by submitting the amended management plan to the Manager for certification. Any amendments must be in accordance with the conditions of this consent. The amendments sought shall not be implemented until the consent holder has received notice in writing that the amendments have been certified by the Manager. All works shall be carried out in accordance with the certified amendments.

¹³

Cultural and archaeological sites, artefacts and human remains

- 10. All contractors undertaking work enabled under this consent shall undergo archaeological site identification training (e.g. middens, taonga etc.) prior to the commencement of work. The archaeological training shall be conducted by a suitably qualified and experienced person.
- 11. An archaeological and cultural assessment will be undertaken at each site, prior to the commencement of any coastal protection works. The New Zealand Historic Places Trust (NZHPT) will be contacted prior to the commencement of any works, and the archaeological assessment will be submitted for their assessment. An archaeological authority from the NZHPT shall be obtained if the NZHPT deems it necessary, before works commence on site.
- 12. The applicant shall contact the New Zealand Historic Places Trust, Kahungunu ki Wairarapa and Rangitane o Wairarapa if the presence of an archaeological site or taonga is suspected. Work affecting archaeological sites is subject to a consenting process under the Historic Places Act 1993. If any activity associated with this proposal, such as earthworks, fencing or landscaping, may modify, damage or destroy any archaeological site(s), an authority (consent) from the New Zealand Historic Places Trust must be obtained for the work to proceed lawfully.

¹¹ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

¹² Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

¹³ Condition changed under section 127 of the Resource Management Act 1991 on 4 March 2026

Note: Evidence of archaeological sites may include burnt and fire cracked stones, charcoal, rubbish heaps including shell, bone and/or glass and crockery, ditches, banks, pits, old building foundations, artefacts of Maori and European origin or human burials.

13. In the event that koiwi are encountered during works for the proposed development, work shall cease immediately and the consent holder shall immediately notify Kahungunu ki Wairarapa, Rangitane o Wairarapa, the New Zealand Historic Places Trust and the New Zealand Police for advice on how to proceed.

Note: Site rehabilitation post construction, maintenance and structural repairs have the potential to disturb further material, and as such a further requirement for archaeological authorities may be triggered.

14. The consent holder shall implement the following procedures if archaeological artefacts or koiwi remains are discovered:
- a) work is to cease immediately;
 - b) the consent holder shall contact: the Manager, Environmental Regulation, Wellington Regional Council; the District Planner, South Wairarapa District Council; Rangitane o Wairarapa; Kahungunu ki Wairarapa and the New Zealand Historic Places Trust immediately;
 - c) representatives of Rangitane o Wairarapa and/or Kahungunu ki Wairarapa iwi authority and the New Zealand Historic Places Trust are to be given sufficient time to carry out an investigation of the site to determine any cultural issues and an appropriate course of action. At the discretion of the Manager, Environmental Regulation, Wellington Regional Council, this action may include a permanent or temporary cessation of work on the site; and
 - d) works shall not recommence until all necessary approvals have been obtained from the New Zealand Historic Places Trust.
15. The consent holder shall provide appropriate information to contractors and operational staff regarding the nature of koiwi remains and archaeological artefacts so that if they are uncovered they will be recognised as such.

Public Safety

16. The consent holder shall ensure that during the construction phase of the physical works, warning signs advising of the works being undertaken shall be erected at both ends of the works area.
17. The consent holder shall ensure that the construction sequence is appropriately managed to minimise the risk to exposed surfaces of adjacent property from accelerated erosion.

Public Access

18. Where public access is currently enjoyed, public access paths will be installed at least every 100 metres. These areas are shown on the amended maps provided with the further

information on 17 September 2010. Access points will be installed, in accordance with the design contained in Appendix I of the application.

Handling of fuel and other Hazardous substances

19. No contaminants (including, but not limited to, oil, petrol, diesel, hydraulic fluid) shall be released to water from equipment being used for the activity and no refuelling of equipment shall take place on any area within the coastal marine area.
20. In the event of a spill of fuel, hydraulic fluid, or other potential liquid contaminants, immediate steps shall be taken to remove or contain the spilled material. Secondly, the consent holder shall notify the Environmental Regulation, Wellington Regional Council, as soon as practicable after the spill.

Construction practices

Hours of Operation

21. Work associated with the construction of the erosion protection structures enabled under this consent shall only take place between the hours of 6:00am and 8.00pm Monday to Saturday inclusive.

Note: Hours of operation within the Coastal Marine Area are subject to tidal movements which restrict the hours of operation. Quiet set-up activities prior to works commencing on any particular day, and quiet set-down activities following completion of any particular days works can occur outside of the stated hours of operation.

Timing

- 22a. The consent holder shall ensure the activity does not disturb the nesting or breeding of nesting dotterel (*Charadrius* sp).
- 22b. The consent holder shall ensure that between 1 August and 31 December each year, work shall only take place:
 1. when an inspection of the site by a suitably trained person knowledgeable in dotterel identification and habitats shows no dotterel are present within 50m of the work area or will not be disturbed; or
 2. where the construction works commenced at the same location prior to 1 August and has not been interrupted for more than seven days.

Concrete

23. New concrete or mortar shall not be exposed to water before the concrete or mortar has hardened to a strength of at least 10 MPa, or for at least 48 hours.

Stockpiling of Materials

24. Where imported material is required to be stock piled during construction of the structure, it shall be stock piled outside the coastal marine area unless otherwise agreed in writing by the Manager, Environmental Regulation, Wellington Regional Council.

Note: Stockpiling will only be allowed to occur in the coastal marine area when there is no suitable area available outside the coastal marine area. Preference shall be given to using the storage areas shown on Maps 1-10 (the revised maps provided on 17 September 2010).

25. Stockpiling of material for emergency use and maintenance (i.e. not associated with a specific current approved work) shall be limited to no more than 1,000 tonnes of boulders at any of the storage areas identified on Maps 1-10 (the revised maps provided on 17 September 2010) for maintenance works.

Noise

26. Noise generated by work in the coastal marine area associated with the construction of the structure shall meet the following:
- the activity will not cause excessive noise (defined in Section 326 of the Resource Management Act 1991) outside the coastal marine area;
 - any construction activities within the Rural Zone shall meet the relevant requirements of the table and provisions in Rule 4.5.2 (e)(i) and 4.5.2 (e)(ii) of the Proposed Wairarapa District Plan and any subsequent amendments or updates;
 - any construction activities within the Residential Zone shall meet the relevant requirements of the table and provisions of Rule 5.5.2 (f)(i) and 5.5.2 (f)(ii), and of the Proposed Wairarapa District Plan and any subsequent amendments or updates.

Note: Rule 4.5.2(e)(i) and (ii) of the Proposed Wairarapa District Plan has not been appealed, is therefore a dominant provision and has effect in relation to administering the Plan. This is intended to achieve consistency in administration in relation to construction activities landward of the coastal marine area that are under the jurisdiction of South Wairarapa District Council.

Environmental Disturbance

27. The consent holder shall take all practical steps to minimise as far as is practicable the nuisance effects of wind-blown dust from construction materials exposed during the construction phase, including but not limited to the use of measures such as dampening the works area.
28. The consent holder shall take all reasonable steps to ensure minimal disturbance to the surrounding environment occurs while any works are proceeding and will make every effort to complete all works in the coastal marine area as soon as is practicable so that disturbance of the foreshore will be limited in duration.
29. The consent holder shall remove from the beach any construction material (including placed rock) that is not an integral component of the structures and placed at an appropriate destination outside of the coastal marine area.
30. The consent holder shall ensure that any subsequent materials associated with repair and maintenance activities authorised by this consent that are no longer required as part of the works, are removed from the site.
31. The consent holder shall ensure that any fill (unprotected by geotextile) used in the seawall structure is free of fine textured material such as silt and clay.

Post construction

32. All equipment and surplus materials used for any of the activities shall be removed from the coastal marine area on completion of the works.
33. Any existing materials on the site that are not naturally occurring, and which are not incorporated as fill behind the seawall shall be removed from the site and disposed of appropriately within 1 month of completing construction of the rock revetment structure.
34. The consent holder shall remove all old riprap and other ad hoc protection not incorporated in the new structure that has been placed on the beach at the site in the past to control erosion. These materials are to be removed within one calendar month of completing the physical works.
35. The consent holder shall ensure that upon completion of the works, the beach is left in a smooth state free of holes, mounds, stockpiles, depressions or surplus materials.

Rehabilitation Post Construction

36. Any exposed soils within the construction site area shall be prepared and sown with grass seed as soon as practicable following completion of the construction works.

Monitoring

37. The consent holder shall make inspections of the protection works after known storm events. The consent holder shall identify and undertake any maintenance, rehabilitation and/or restoration required to the erosion protection structure within three months of the storm event occurring. Geotextile and/or other man-made material that has been uncovered, eroded and/or disturbed from the structure shall be either removed or replaced as soon as is practicable.
38. Inspections of the erosion protection works constructed under this consent shall be undertaken annually (by 31 May of each year) by the consent holder. Both hard and soft erosion protection 'structures' shall be inspected.
39. A written report shall be sent to the Manager, Environmental Regulation, Wellington Regional Council, outlining the results of annual monitoring, including whether any changes in the structure are observed that require corrective actions made to the structure and any subsequent erosion at the ends of the structure.

Record of Public Complaints

40. The consent holder shall maintain a record of any complaints relating to coastal erosion and/or adverse environmental effects within the site and the coastal environment adjacent to the rock revetment structures, and shall be forwarded to the Manager, Environmental Regulation, Wellington Regional Council, on request, and shall include:
 - the location where the adverse effect was detected by the complainant;
 - the date and time when the adverse effect was detected;
 - a description of the adverse effect(s) that led to the complaint;

- a description of the weather and sea conditions at the time the adverse effect was detected by the complainant;
- the most likely cause of the adverse effect detected; and
- any corrective action undertaken by the consent holder to remedy or mitigate the adverse effect detected by the complainant.

Maintenance

Structural Repairs

41. In the event of damage to the structure, any of the construction materials so dislodged should either be used to repair the damage, or alternatively be removed from the CMA.

Note: Maintenance shall be within the scope of the information and design specifications set out in the resource consent application. The structure should not be enlarged as a result of maintenance, unless within the scope of a permitted activity rule.

42. The consent holder shall maintain all structures installed in relation to this consent in a safe and usable condition, and shall repair any damage from storm events as soon as practicable, for the term of this consent.

Removal of Structure

43. Prior to a decision to remove the structure, an assessment of the effects of removal relative to leaving the structure in place shall be carried out, and a copy of the report shall be sent to the Manager, Environmental Regulation, Wellington Regional Council. Should the structure fail and/or the consent holder decides to no longer maintain the structure, any man-made material shall be promptly removed from the coastal marine area and disposed of in an appropriate manner.

Existing Structures

44. All existing structures (boulder beaches), as identified on the Map series submitted with the consent application WAR090322 lodged with the Wellington Regional Council on 24 April 2009 and the further information dated 17 September 2010, are to be managed in accordance with these conditions.

Review of Conditions

45. The Wellington Regional Council may review any or all conditions of this permit by giving notice of its intention to do so pursuant to section 128 of the Resource Management Act 1991, at any time within three months of the date of commencement of this permit for either of the following purposes:
- Dealing with any adverse effects on the environment which may arise from the exercise of this consent, and which is appropriate to deal with at a later stage; and/or
 - To review the adequacy of any plans and/or alter any monitoring requirements prepared for this consent so as to incorporate into the consent any modification which may become necessary to clarify or deal with any adverse effect on the environment of arising from this activity; and/or
 - To enable consistency with the Regional Coastal Plan and/or with National Environmental Standards.

Notes:

- a) A charge, set in accordance with section 36(2) of the Act, shall be paid to the Wellington Regional Council for carrying out its functions in relation to the administration, monitoring, and supervision of the activity, and for carrying out its functions under section 35 (duty to gather information, monitor and keep records) of the Act.
- b) The Wellington Regional Council shall be entitled to recover from the consent holder the costs of the conduct of any review, calculated in accordance with and limited to that Council's scale of charge in force and applicable at that time pursuant to Section 36 of the Resource Management Act 1991.

Reasons for decision

1. Background and proposal

South Wairarapa District Council (the applicant) currently holds resource consent WAR090322, which commenced on 20 March 2012 after being granted as a notified consent under the Resource Management Act 1991 (RMA) (referred to as the existing consent). The existing consent is a coastal permit and authorises occupation, reclamation, disturbance, and general structures in the coastal marine area along Cape Palliser Road to provide for the construction of seawalls to protect Cape Palliser Road from coastal erosion.

The applicant has applied to Wellington Regional Council (Greater Wellington) for a variation to resource consent conditions in accordance with section 127 of the RMA.

1.1 Background

The applicant gave effect to the existing consent and installed boulder beaches including at Buckley (NZTM 1784379.5405879) and Turner's Bay (NZTM 1784964.5399014). In 2020 the applicant applied to Greater Wellington for a resource consent (WAR090322 granted 21 October 2020) to replace these existing boulder beaches with EcoReef structures to trial an alternative method of erosion protection. The applicant considered that the trial was successful and has therefore applied to change conditions to enable EcoReef structures to be installed at several locations where boulder beaches were authorised under the existing consent.

Under section 127(1) of the RMA, the applicant has applied to change condition(s) of consent WAR090322 to provide for the construction of EcoReef structures instead of boulder beaches at the following locations (see Figure 1):

- Pinnacles – Johnsons Hill North
- Te Kopi – Johnsons Hill South
- Whatarangi/Buckleys Beach
- Turners Bay



IMAGE: WELLINGTON 0.2M RURAL
AERIAL PHOTOS (2025)
LAND INFORMATION NEW ZEALAND

Figure 1: locations where EcoReef structures will be provided for. Source: EcoReef (16 January 2026). Cape Palliser EcoReef Sites Scaled Location Plans.

In their application, the applicant did not specify the changes being sought to the wording of the conditions. Greater Wellington provided draft amendments to the wording of the conditions to the applicant, who agreed to the changes set out in the following table:

No.	Condition details
1	<p>Existing condition:</p> <p>The location, design, implementation and operation of the physical works shall be in general accordance with the consent application and its associated plans and documents lodged with the Wellington Regional Council on 27 April 2009, and the amended application dated 17 September 2010.</p> <p>For the avoidance of doubt, where information contained in the application is contrary to conditions of this permit, the conditions shall prevail.</p> <p>Where there may be contradiction or inconsistencies between the application and further information provided by the applicant, the most recent information applies. In addition, where there may be inconsistencies between information provided by the applicant and conditions of the consent, the conditions apply.</p> <p><i>Note: Any change from the location, design concepts and parameters, implementation and/or operation may require a new resource consent or a change of consent conditions pursuant to section 127 of the Resource Management Act 1991.</i></p> <hr/> <p>Proposed condition:</p> <p>The location, design, implementation and operation of the physical works shall be in general accordance with the consent application and its associated plans and documents lodged with the Wellington Regional Council on 27 April 2009, and the amended application dated 17 September 2010, and further information received on:</p>

No.	Condition details
	<ul style="list-style-type: none"> • The application to change conditions of consent under s127 of the RMA, its associated plans and documents lodged with the Wellington Regional Council (s127 application) received on 23 September 2025, and further information supplied including: • Resource Consent Application to Vary WAR090322 to enable EcoReef to replace Boulder Beaches in three locations and appendices, dated September 2025 • Landscape and Visual Effects Assessment and appendices, dated December 2025 • Updates to the Landscape and Visual Effects Assessment and appendices received 16 January 2026. <p>For the avoidance of doubt, where information contained in the application is contrary to conditions of this permit, the conditions shall prevail.</p> <p>Where there may be contradiction or inconsistencies between the application and further information provided by the applicant, the most recent information applies. In addition, where there may be inconsistencies between information provided by the applicant and conditions of the consent, the conditions apply.</p> <p><i>Note: Any change from the location, design concepts and parameters, implementation and/or operation may require a new resource consent or a change of consent conditions pursuant to section 127 of the Resource Management Act 1991.</i></p>
6	<p>Existing condition:</p> <p>The management of activities and their effects will be carried out according to three defined zones as defined by this consent:</p> <ul style="list-style-type: none"> • Immediate Works Zones – where hard defence works may be constructed according to the process set out in condition 8 • Active Management Zones – where boulder beaches may be constructed and / or a range of management techniques will be used, according to the process set out in condition 9. • No Go Zones – where no work will be undertaken. <p>The ‘Immediate Works’, ‘Active Management’ and ‘No Go’ Zones are identified on the ‘Priority Rating’ Maps 1-10, submitted to Wellington Regional Council on 17 September 2010 as part of the WAR090322 section 92 RMA response.</p> <hr/> <p>Proposed condition:</p> <p>The management of activities and their effects will be carried out according to three defined zones as defined by this consent and s127 application received on 23 September 2025:</p> <ul style="list-style-type: none"> • Immediate Works Zones – where hard defence works may be constructed according to the process set out in condition 8 • Active Management Zones – where boulder beaches may be constructed and / or a range of management techniques will be used, according to the process set out in condition 9.

No.	Condition details
	<ul style="list-style-type: none"> • EcoReef Sites – meaning areas where EcoReef seawalls may be placed, identified as “Pinnacles – Johnsons Hill North”, “Te Kopi – Johnsons Hill South”, “Whatarangi/Buckleys Beach” and “Turners Bay” in the document <i>Cape Palliser EcoReef Sites Scaled Location Plans</i> (EcoReef, 16 January 2026), in accordance with all conditions to consent except for Conditions 9 and 10. • No Go Zones – where no work will be undertaken. <p>The ‘Immediate Works’, ‘Active Management’ and ‘No Go’ Zones are identified on the ‘Priority Rating’ Maps 1-10, submitted to Wellington Regional Council on 17 September 2010 as part of the WAR090322 section 92 RMA response.</p>
10A	<p>New condition:</p> <p>The consent holder shall submit a detailed design for each EcoReef structure at each EcoReef Site at least 20 working days prior to the proposed date of commencement of works at each EcoReef Site. The detailed design shall be prepared and certified by a suitably qualified and experienced Chartered Professional Engineer.</p> <p>The detailed design shall demonstrate that the final design of each EcoReef structure is in accordance with the conditions of this consent, and include (but not be limited to) the following:</p> <ol style="list-style-type: none"> a. Drawings, including plans, elevations, cross sections, and details showing the final design of each EcoReef structure; b. Description of how and where public access will be integrated into the design of each EcoReef structure; c. Description of how each EcoReef structure will integrate with any adjacent bridges or culverts; d. Description of how the ends of each EcoReef will integrate with adjacent existing foreshore and seabed or adjacent existing rock revetment structures; e. In relation to the “Te Kopi – Johnsons Hill South” EcoReef Site: <ol style="list-style-type: none"> i. Drawings that demonstrate that the final design of the structure has minimised the visibility of the structure from the road to the greatest extent practicable; ii. Drawings that illustrate how the final design of the structure will integrate with the prominent landform located on the northern side of the northern stream mouth, without bisecting the landform.

No.	Condition details
10B	<p>New condition: The consent holder shall construct each EcoReef structure in accordance with the detailed design for each structure submitted to the Manager under Condition 10A.</p>
10C	<p>New condition: At least 20 working days prior to the commencement of construction at each EcoReef Site, the consent holder shall submit a EcoReef Construction Environmental Management Plan to the Manager for certification. The CEMP shall be prepared by a suitably qualified and experienced person, in consultation with the contractor, and shall include:</p> <ul style="list-style-type: none"> a. Responsibilities and contact details of all parties responsible for the construction of the EcoReef structure; b. Identification of the area of foreshore and seabed within the coastal marine area, and land adjacent to the coastal marine area, that will be disturbed during the construction works; c. Construction methodology and programme; d. Methods of construction access that will minimise disturbance of the foreshore and seabed; e. Identification of erosion and sediment control measures that will be implemented to minimise the discharge of sediment from construction works to the coastal marine area; f. Details of processes/measures to be put in place to prevent the discharge/spillage of oil, grout, cement and other contaminants to the coastal marine area; g. Procedures to be undertaken in the event of a discharge/spillage of oil, grout, cement and other contaminants to the coastal marine area; h. Methods that will be used to temporarily exclude public access to the work site during construction.
10D	<p>New condition: Works shall not commence at any EcoReef Site until the consent holder has received notice in writing that the CEMP for that site has been certified by the Manager.</p>
10E	<p>New condition: The consent holder shall undertake all works in accordance with the certified CEMP for that site.</p>

No.	Condition details
10F	<p>New condition:</p> <p>At least 20 working days prior to submission of the Landscape Management Plan under Condition 10G, the consent holder must provide a draft version of the plan to Ngāti Kahungunu ki Wairarapa Charitable Trust, Kahungunu ki Wairarapa Tāmiki Nui a Rua, and Rangitāne o Wairarapa Inc., and invite Ngāti Kahungunu ki Wairarapa Charitable Trust, Kahungunu ki Wairarapa Tāmiki Nui a Rua, and Rangitāne o Wairarapa Inc. to comment on these draft versions.</p> <p><i>Note: If Ngāti Kahungunu ki Wairarapa Charitable Trust, Kahungunu ki Wairarapa Tāmiki Nui a Rua, and/or Rangitāne o Wairarapa Inc. choose to not be involved in the development of management plans, and/or if no response is received 10 working days after receipt of the invitation, the consent holder will have complied with this consent.</i></p> <p><i>Note: Mana whenua can be contacted at the following addresses:</i></p> <ul style="list-style-type: none"> • <i>Ngāti Kahungunu ki Wairarapa Charitable Trust: mariana@kahungunuwairarapa.iwi.nz</i> • <i>Kahungunu ki Wairarapa Tāmiki Nui a Rua: resource.consent@kkwtmr.org.nz</i> • <i>Rangitāne o Wairarapa Inc.: taiao@rangitane.iwi.nz</i>
10G	<p>New condition:</p> <p>The consent holder shall submit a Landscape Management Plan (LMP) for the “Pinnacles – Johnsons Hill North” and “Te Kopi – Johnsons Hill South” EcoReef Sites at least 20 working days prior to the proposed date of commencement of works authorised by this consent at those sites.</p> <p>The purpose of the LMP is to demonstrate the measures, procedures, and methodologies that will be put in place to manage the actual and potential effects on landscape and natural character resulting from construction of EcoReef structures over the life of the structures.</p> <p>The LMP shall be prepared by a suitably qualified and experienced person and shall be in accordance with the revised Landscape and Visual Effects Assessment RFI Revision December 2025 (Landscape & Visual Effects Assessment Cape Palliser Coastal Protection (Revised Draft 22 December 2025).pdf) submitted with the application and further information received 22 December 2025 and 16 January 2026.</p> <p>The LMP shall include (but not be limited to) the following information, plans, and details:</p> <ol style="list-style-type: none"> a. Details on how any feedback received from parties under Condition 10F has been incorporated into the LMP; b. Delineation of the working area the LMP relates to;

No.	Condition details
	<ul style="list-style-type: none"> c. Details of indigenous planting in and adjacent to each EcoReef structure, including a programme/timeframe to ensure plant success rate of at least 80% take is achieved within 5 years of planting; d. A plan demonstrating the location, lengths, widths, and areas where the required planting is to be implemented, including fencing if proposed; e. A detailed planting plan prepared by a suitably qualified person, including, but not limited to, details of plant species, size, grade, density, number and relative composition; f. Details of eco-sourcing (plants that have been sourced and propagated from the Wellington Ecological District) and how plants are appropriate for the location; and g. Details of, and a programme for, maintenance, monitoring, and measuring success of the required planting for a minimum period of five years: <ul style="list-style-type: none"> 1. The specific targets, timeframes, methodologies and measures/criteria to determine the success of the wetland planting; 2. Measures outlining how the legal and physical protection of the mitigation planting will be achieved in perpetuity; 3. Details of the on-going maintenance of the planting including, but not limited to, the replacement of plants, future management, and control of pest plants; and 4. Details of how plants will be protected from pest animals.
10H	<p>New condition: No works at the “Pinnacles – Johnsons Hill North” and “Te Kopi – Johnsons Hill South” EcoReef Sites shall commence until the consent holder has received notice in writing that the LMP has been certified by the Manager.</p>
10I	<p>New condition: The consent holder shall undertake all works at the “Pinnacles – Johnsons Hill North” and “Te Kopi – Johnsons Hill South” EcoReef Sites in accordance with the certified LMP.</p>

No.	Condition details
10J	<p>New condition:</p> <p>No later than 20 working days after the completion of construction at each EcoReef Site, the consent holder shall submit a Renourishment Plan to the Manager for certification. The purpose of the Renourishment Plan is to ensure edge protection of EcoReef structures is adequate and prevents erosion.</p> <p>The Renourishment Plan shall be prepared by a suitably qualified and experienced person and shall include:</p> <ol style="list-style-type: none"> a. Circumstances under which renourishment will be required to mitigate end effects associated with potential outflanking, and/or effects on the foreshore after weather events; b. Trigger levels for renourishment at each location; c. Methodologies for placement of renourishment material that minimise the disturbance of habitats of indigenous flora and fauna; d. A plan for deposition of renourishment material, including identification of areas to be avoided including outfalls, and stream mouths; e. The name and location of the sediment source for renourishment material, including confirmation that the material is free of any organic matter or contaminants; f. Details on sediment source composition of renourishment material and demonstration sediment is of a similar composition to the in-situ material within the foreshore and seabed and will maintain the existing profile. <p><i>Advice note: after the first Renourishment Plan has been certified, renourishment plans for subsequent sites may be provided as an amendment to the first certified Renourishment Plan.</i></p>
10K	<p>New condition:</p> <p>The consent holder shall monitor and undertake renourishment of the foreshore and seabed adjacent to each EcoReef structure in accordance with the certified Renourishment Plan for the duration of the consent.</p>

No.	Condition details
10L	<p>New condition:</p> <p>The consent holder may request amendments to the EcoReef Construction Environmental Management Plan, EcoReef Landscape Management Plan, or Renourishment Plan by submitting the amended management plan to the Manager for certification. Any amendments must be in accordance with the conditions of this consent. The amendments sought shall not be implemented until the consent holder has received notice in writing that the amendments have been certified by the Manager. All works shall be carried out in accordance with the certified amendments.</p>

In accordance with section 127(3) of the RMA this application is considered a **discretionary activity**.

2. Notification decision

A decision was made on 4 March 2026 to process the application on a non-notified basis as the effects of the change of conditions are considered to be less than minor under s95D. Further information on the notification decision is provided in document # [CFDKSXCKCNM2-1989467999-266](#).

For this application it is considered that there are no affected persons.

3. Consultation

Iwi authority	Comments
Kahungunu ki Wairarapa Charitable Trust	<p>A summary of the proposal and access to the application documents were provided to Kahungunu ki Wairarapa Charitable Trust.</p> <p>At the time of writing this report, no comment had been received from Kahungunu ki Wairarapa Charitable Trust.</p>
Kahungunu ki Wairarapa Tāmaki Nui a Rua	<p>A summary of the proposal and access to the application documents were provided to Kahungunu ki Wairarapa Tāmaki Nui a Rua.</p> <p>At the time of writing this report, no response had been received from Kahungunu ki Wairarapa Tāmaki Nui a Rua.</p>

Rangitāne o Wairarapa	<p>A summary of the proposal and access to the application documents were provided to Rangitāne o Wairarapa. Consent conditions were also provided to Rangitāne o Wairarapa.</p> <p>Rangitāne o Wairarapa did not raise any concerns with regard to the consent application, but noted the importance of an accessible road and the potential need for alternatives if the EcoReef structures fail to provide adequate protection.</p>
<p>Applicant group(s) under the Marine and Coastal Area (Takutai Moana) Act 2011 (MACA)</p>	<p>In accordance with section 62 of the MACA the applicant has confirmed that they have notified and sought the views of the relevant applicant group(s), listed below:</p> <ul style="list-style-type: none"> • Ngati Kahungunu ki Wairarapa Tamaki nui a rua • Rangitāne o Wairarapa and Rangitāne o Tamaki nui-a-Rua • Tukoko and Ngati Moe • Rangitāne North Island • Ngati Hinewaka

4. Effects of condition change

An assessment of environmental effects was made undertaken as part of the consideration of the existing consent. This assessment focuses on the effects of changing conditions 1 and 6, and adding conditions 10A-10L only.

4.1 Environmental effects

The applicant provided an Assessment of Environmental Effects (AEE) with the application.

On the basis that the application seeks to change the design of seawall from boulder beaches to EcoReef structures, the principal effects of the change in design are:

- Effects on coastal processes
- Effects on landscape and natural character

The application was reviewed on behalf of Greater Wellington by the following experts:

- Dr Iain Dawe, Expert in Natural Hazards and Coastal Processes, Senior Policy Advisor, Greater Wellington
- Emma McRae, Landscape Architect, Senior Principal, Boffa Miskell

4.2 Effects on coastal processes

Construction of a structure on the coast may change patterns of erosion or exacerbate erosion at alternative locations. In addition, structures constructed to provide erosion protection may themselves break down over time due to erosion, contributing to coastal hazards.

The coastal processes aspects of the application, as well as the documents that recorded the results of the EcoReef trial, were reviewed by Dr Iain Dawe. Dr Dawe considered that the effects of EcoReef structures would not be fundamentally different in terms of effects on the coastal environment compared to boulder beaches (i.e., engineered revetments and rip rap).

Dr Dawe had no comments on the Turners Bay and Buckley's Beach locations and considered that, as these sites already have EcoReef structures installed and the design has been tested for the conditions at these beaches, he had no outstanding comments or concerns.

Regarding Whatarangi Bluffs and Johnsons Hill, Dr Dawe noted that landscape processes are dominated by rapidly eroding cliffs and that the authorised boulder beaches are one of many attempts to mitigate this erosion. The proposed EcoReef structures will likely be as, if not more, effective than the existing boulder beaches in this environment.

Dr Dawe recommended a condition be included that required the EcoReef to be removed or remediated if it becomes stranded on the foreshore. I consider this is met by existing condition 41, which requires the structure to be repaired or removed if it becomes damaged or material is dislodged.

Based on the advice provided by Dr Dawe, I consider that the effects of the proposal on coastal processes will be appropriately managed, subject to the proposal being undertaken in accordance with the changes to consent conditions.

4.3 Landscape and natural character effects

Erosion protection structures may change the natural character of a coastal environment.

Landscape and natural character effects were reviewed by Ms Emma McRae. Ms McRae requested further information on the dimensions of the proposed EcoReefs, as well as an objectives and policies assessment against Te Tangi a Te Manu (Aotearoa New Zealand Landscape Assessment Guidelines)¹⁴ and the Natural Resources Plan.

¹⁴ New Zealand Institute of Landscape Architects (July 2022). *Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines*. See: https://nzila.co.nz/media/uploads/2022_09/Te_Tangi_a_te_Manu_Version_01_2022_.pdf

Following receipt of the s92 response, Ms McRae was satisfied with the level of information provided with the application. Ms McRae recommended the following conditions:

- Submission of detailed design prior to construction work at any site how the EcoReefs will tie in and interface with the existing location, including provision of public access and integration with adjacent bridges/culverts
- Submission of a planting plan at Pinnacles – Johnsons Hill North and Te Kopi – Johnsons Hill South to ensure planting progresses at this location post-construction to the extent possible
- Submission of a renourishment plan to ensure edge protection of EcoReefs is sufficient, and that any erosion of the foreshore and seabed will be managed and remediated

Ms McRae did not consider the construction of EcoReefs would increase the effects on landscape and natural character effects above the moderate effects assessed as part of the consideration of the existing consent.

Based on the advice provided by Ms McRae, I consider that the effects of the proposal on landscape and natural character will be appropriately managed, subject to the proposal being undertaken in accordance with the changes to consent conditions.

4.4 Summary of effects

Given the assessment above, it is considered that the proposed change of consent conditions will not result in any more than minor adverse effects when undertaken in accordance with the amended and existing consent conditions.

I have recommended the applicant submit a construction management plan prior to starting works to ensure any adverse effects on the coastal environment, including the foreshore and seabed, are mitigated and managed.

5. Statutory assessment

5.1 Part 2

Consideration of an application under section 104 of the RMA is 'subject to Part 2' (sections 5, 6, 7 and 8) of the RMA, which sets out the purpose and principles. I acknowledge the case law direction in *R J Davidson Family Trust v Marlborough District Council* [2018] NZCA 316 that the statutory language in section 104 plainly contemplates direct consideration of Part 2 matters, when it is appropriate to do so. Further, the Court considered that where a plan has been competently prepared under the RMA it may be that in many cases there will be no need for the

Council to refer to Part 2 because it would not add anything to the evaluative exercise. However, if there is doubt that a plan has been “competently prepared” under the RMA, then it will be appropriate and necessary to have regard to Part 2.

In my view, the NRP is competently prepared, and I do not consider there is a need to refer to Part 2.

5.2 Matters to be considered – Sections 104-108AA

Sections 104-108AA of the RMA provide a statutory framework in which to consider resource consent applications. All relevant matters to be considered for this application are summarised in the table below:

RMA section	Matter to consider	Comment
104(1)(a)	Actual or potential effects on environment	See Section 5 of this report.
104(1)(ab)	Measures to offset or compensate for adverse effects on the environment	The applicant has not proposed any measures to offset or compensate for adverse effects on the environment.
104(a)(b)(iv)	<p>New Zealand Coastal Policy Statement</p> <p>I have assessed the application against the New Zealand Coastal Policy Statement (NZCPS). The NZCPS requires the preservation of the natural character of the coastal environment, and for the coast to be protected for inappropriate use and development.</p> <p>The applicant has supplied an assessment of the natural character of each site of proposed works as well as the Wairarapa coastline. The applicant identified that the natural attributes of the proposed EcoReef locations have been modified by roads, bridges, settlements, pastoral overlays, and existing erosion protection structures. In addition, the natural character has been further modified by erosion into roads.</p> <p>I have considered the existing natural character of the Wairarapa coast and, given assessment by a natural character and landscape expert, and compliance with consent conditions, construction of EcoReef structures (as an alternative to the existing boulder beaches) is generally consistent with the objectives and policies of the NZCPS.</p>	

	<p>Objective 2 Policy 13, Policy 14</p>	<p>These provisions relate to preserving the natural character and features of the coastal environment by recognising and identifying values, as well as encouraging restoration of the coastal environment.</p> <p>The applicant provided an assessment of natural character with the application. Following expert review, I consider the proposed change of conditions (construction of an EcoReef) will have no more of an effect on natural character than the boulder beaches authorised by the existing consent. In addition, the proposed EcoReef structures incorporate coastal vegetation planting and allow for renourishment, contributing to the restoration of coastal environment characteristics.</p> <p>I consider the application is consistent with these provisions.</p>
	<p>Objective 3</p>	<p>This objective relates to taking account to the principles of Te Tiriti o Waitangi and recognising mana whenua as kaitiaki, as well as providing for involvement in coastal management.</p> <p>A copy of the application and draft conditions was provided to mana whenua, who were given the opportunity to provide comment. Comment informed the development of a planting plan, which requires consultation with mana whenua prior to submission.</p> <p>I consider the application is consistent with this objective.</p>
	<p>Objective 4</p>	<p>This objective relates to maintaining and enhancing public open space qualities and recreation opportunities in the coastal environment.</p> <p>Construction of the EcoReef (i.e., a coastal erosion protection structure) will support the resilience of Cape Palliser Road to continue to provide public access to and along the coastal marine area, as well as communities located along the road. The proposed design includes public access points to the coastal marine area. In addition, conditions require public access to be integrated into EcoReef design. Where restrictions to public access occur during</p>

		<p>construction, these will be temporary with the intention of providing and preserving access over the life of the structure.</p> <p>I consider the application is consistent with this objective.</p>
	Objective 6 Policy 6	<p>These provisions relate to enabling people and communities and their health and safety, and to consider how development will provide for communities while avoiding adverse visual effects and protecting natural character, open space, public access, and amenity values.</p> <p>I have considered the effects of the proposal, including visual and natural character, on local communities while processing this application. The EcoReef structures will provide for protection of existing coastal communities from coastal hazards.</p> <p>I consider the application is consistent with these provisions.</p>
104(1)(b)(v)	<p>Regional Policy Statement (including proposed Change 1)</p> <p>Following the decision on proposed Change 1, the freshwater provisions, denoted by an FW, of the RPS Change 1 are now deemed operative.</p>	
	Objective 4 Policy 35, 36	<p>These provisions relate to ensuring natural character of the coastal environment is recognised and preserved.</p> <p>The applicant has provided a natural character assessment, which has been reviewed by a relevant subject expert. Given expert review, and provided the applicant complies with recommended consent conditions, I consider the application is consistent with these provisions.</p>
	Objective 8 Policy 53	<p>These provisions relate to maintaining and enhancing public access to the coastal environment.</p> <p>Construction of erosion protection structures will support the resilience of Cape Palliser Road. I consider the application is consistent with these provisions.</p>

	Objectives 23, 24, 26, 27	<p>These objectives relate to recognising the role tangata whenua have in decision making, and the need to consider Te Tiriti o Waitangi when making decisions regarding resource management. They also relate to maintaining the mauri of waterbodies and mahinga kai are maintained in a healthy and accessible state for tangata whenua.</p> <p>I have considered these objectives while assessing this application.</p>
104(1)(b)(vi)	Natural Resources Plan	
	Objectives O1, O2, O3, O4 Policy P1	<p>These objectives and policies relate to the holistic and integrated use and management of resources. I have recognised and considered these objectives while assessing this consent application and consider that, with the application of the recommended conditions of consent, the proposal is consistent with this objective and policies.</p>
	Objective O7, O8, O47 Policy P8	<p>These provisions relate to ensuring that the recreational values of the coastal marine area are maintained and enhanced.</p> <p>Construction of erosion protection structures will support the resilience of Cape Palliser Road. I consider the application is consistent with these provisions.</p>
	Objectives O12, O13 Policies P9, P18, P20, P21	<p>These provisions recognise the cultural relationship between Māori and air, land and water, recognise and provision for kaitiakitanga, and recognise the need to maintain the mauri of fresh and coastal waters, including for customary use.</p> <p>A copy of the application and draft conditions was provided to mana whenua, who were given the opportunity to provide comment. Comment informed the development of a planting plan, which requires consultation with mana whenua prior to submission.</p> <p>I consider that, with the application of the recommended conditions of consent, the proposal is consistent with these objectives and policies.</p>

	Objective O45, O46, O48 P139	<p>These provisions require development to have a functional need and an operational requirement, and to be of an appropriate scale and in an appropriate location.</p> <p>The purpose of the application is support the resilience of Cape Palliser Road (a regionally significant road). There are no alternative locations for the structure, and the structure is required to provide physical access to the coast, including coastal settlements.</p> <p>I consider the application is consistent with these provisions.</p>
	P141	<p>This policy requires regard to be given to relevant provisions in the operative district plan relating to public open space values and visual amenity in relation to use and development of the coastal marine area.</p> <p>The applicant has provided a review against the relevant provisions in the Wairarapa Combined District Plan. Based on a review of the application by an expert in landscape and natural character, I consider the application to be in accordance with this policy.</p>
	P146	<p>This policy provides direction on the construction, alteration, or replacement of seawalls.</p> <p>I am satisfied that, subject to meeting the amended conditions, the proposal will be consistent with this policy.</p>
104(1)(c)	Any other matter	There are no other matters relevant to this application.
108 – 108AA	Conditions on resource consents	<p>All the conditions of consent meet s108 and s108AA of the RMA. I have assessed the conditions against the criteria in s108AA and consider that they:</p> <ul style="list-style-type: none"> • have been agreed to by the applicant, and so meet s108AA(1)(a) • are directly connected to an adverse effect of the activity on the environment, a regional rule or an NES, and so meet s108AA(1)(b) • relate to an administrative matter of the resource consent, and so meet s108AA(1)(c)

6. Statutory assessment

I have assessed the application against the relevant statutory documents and consider:

1. The proposed change is consistent with the Purposes and Principles (Part 2) of the RMA.
2. The proposed change is consistent with original assessment undertaken in accordance with section 104-108AA of the RMA and is consistent with the relevant objectives and policies in the Natural Resources Plan. There are no additional or new matters to be considered with this application.
3. The proposed changes to consent conditions meet s108AA of the RMA.

7. Duration of consent

Under section 127(1)(b) of the RMA, no consent holder may apply for a change of the consent duration and so the consent expiry date will remain as 30 September 2046.

8. Monitoring

The current compliance monitoring programme and associated charges will remain.

Decision recommended by:	Katherine Greenaway	Resource Advisor, Environmental Regulation	
Decision peer reviewed by:	Andrew Banks	Senior Resource Advisor, Environmental Regulation	
Decision approved by:	Richard Percy	Team Leader, Environmental Regulation	

Processing timeframes:

Application lodged:	03/03/25	Application officially received:	24/09/25
Application stopped (s92):	21/10/25	Application started:	16/01/26
Applicant to be notified of decision by:	04/03/26	Applicant notified of decision on:	04/03/26
Time taken to process application:	50 working days (including 30 working days under s37)		

The applicant provided written agreement for a total of 30 working days under section 37A(5) of the RMA.

The reasons for the extensions are:

- 10 working days on 1 October 2025 to allow for expert review ([#CFDKSXCKCNM2-1989467999-269](#))
- 10 working days on 5 February 2026 to allow for review and comment on conditions ([#CFDKSXCKCNM2-1989467999-270](#))
- 10 working days on 19 February 2026 to allow for mana whenua comment ([#CFDKSXCKCNM2-1989467999-271](#))

In making this decision, the Wellington Regional Council has given consideration to the following issues, as required by section 37A(1) of the RMA:

- The interests of any person who the Council considers may be directly affected by the extension;
- The interests of the community in achieving adequate assessment of the effects of the proposal; and
- The Council's duty under section 21 of the RMA to avoid unreasonable delay.

Decision approved by:	Richard Percy	Team Leader, Environmental Regulation	
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