

18 May 2022

Expert Consenting Panel – Whakatāne Commercial Boat Harbour
Environmental Protection Agency
Via email: Whakatane.Fasttrack@epa.govt.nz

Dear Panel Members,

Re: DRAFT CONDITIONS OF CONSENT FOR WHAKATANE COMMERCIAL BOAT HARBOUR

Please find attached the comments from Whakatane Yacht Club Inc. upon the draft conditions, as requested in your email of 11 May 2022.

We take this opportunity, also, to convey our concerns relating specifically to the proposed boat harbour access channel from ch.1.2 km to ch.3.8 km in the lower reaches of the Whakatane River.

The applicant's AEE on this component of the EPA application is inadequate, in our view. We refer to assessment reports on Coastal Process and on Navigation, (Appendices I and Appendix J of the application). There are substantial gaps in coverage between these two reports.

The applicant's response to our comments of 5 April underscores the lack of enquiry into the most basic matters. For example:

1. How many vessel movements?
2. Average Time of travel, per vessel movement?
3. Time of travel from the existing commercial wharf to ch 3.8 km, at 5 knots proper speed, one hour before low water on an average ebb tide, average river flow?
4. Wake effects on exposed silt banks given the duration of exposures calculated in items 1-3?
5. Wake effects and conflicts with existing river users including K1 kayak paddlers, given the duration of exposures calculated in items 1-3?

Put simply, the river environment upstream of the existing HDZ is not suited to the passage of vessels of the size and number contemplated in the application.

We had inadequate time to consider the applicant's reports, prior to 8 April. Like the Eastern Bay Canoe Racing Club, we were not consulted on effects of the operation and maintenance of the access channel. We have now had time to consider the reports, and are happy to attend a hearing to explore these matters.

Please do not hesitate to contact the undersigned should you require any clarification.

Yours sincerely

Jim Williamson
Commodore



per Barry Cutfield
Marina Manager

DATE: 18 May 2022

SUBJECT: Whakatāne Commercial Boat Harbour, Consent Conditions

SUBMISSION TO: Whakatāne Commercial Boat Harbour Expert Consenting Panel

FROM: WHAKATANE YACHT CLUB INC.

1.0 BACKGROUND

1.1 Dredging

Irrespective of the dredging method used, Whakatāne Commercial Boat Harbour access channel dredging operations will dislodge sediments which are likely to be transported downriver to deposit in the Harbour Development Zone (HDZ), in still water areas such as those occupied by the Club's existing marina and access channel.

Mobilised material will settle temporarily on the silt banks which expose in the river channel at lower tidal levels. This material will be remobilised downriver by the breaking wave action generated by Whakatāne Commercial Boat Harbour vessel wakes. The wakes from the larger commercial vessels are likely to have amplitudes approaching 300mm. Wake amplitudes are enhanced as the waves traverse the shallower water of the silt banks. Particularly at low tide, the channel cross-sections reduce in area upstream of the HDZ to the extent that the vessels displace a significantly greater portion of the channel section. This introduces displacement effects to the wake regime, which further amplify displacement wave energy.

While some of the dredging methods proposed are suitable for dredging in the HDZ, none of them will be practicable in the substantially swifter ebb currents at the Whakatāne Commercial Boat Harbour access channel. The Club has direct experience of this, in managing barge mounted equipment at the upstream limit of the HDZ whilst accessing a loading site on the left bank during its marina dredging operations.

Furthermore, any attempt to dredge in currents exceeding 1 knot, or 0.50 m/sec, will result in high losses of material to the river flow.

Draft consent conditions, **5.2 Dredging – Methods**, allow for jetting or agitator pumps (5.2.1 d.), or disking, jetting, or Agitation by mechanical plant (5.2.2). All of these methods simply agitate the bed sediments and rely on river currents to transport them clear of the Whakatāne Commercial Boat Harbour access channel. These methods are inappropriate in an up-harbour environment, where the transported sediment is simply going to settle in down-current locations.

Draft consent condition **5.6 Dredging – Monitoring of water clarity and quality** does not specify monitoring intervals and is confused as to sampling locations with respect to current. Similarly, there is no requirement to undertake suspended solids testing March-August. It is not clear whether that is intentional, but it is not the case in the HDZ dredging consent Consent Number: 65217 upon which these draft conditions are supposedly modelled.

References to the “Boat Harbours access channel” and the “in-river navigation channel” and the Whakatane River channel require clarification in the context of section 5 of the proposed consent conditions. It is noted that condition 5.7.1 limits the scope of monitoring to the channel upstream of the HDZ. Whether that intended to apply to the remaining references remains unclear.

1.2 Community Liaison

The Eastern Bay Canoe Racing Club (EBCRC) is affected by the access channel operation, and navigational marking, more than any other community group.

EBCRC is based at the Whakatane Yacht Club HQ and the 30 strong contingent of young flat-water canoe racers and coaches ply the waters of the Whakatane River from the entrance to the Whakatane Bridge. The attached Beacon article from this week gives a snapshot of the club’s activities. The photograph shows the faces of the young folk who will be displaced from their training waters by the traffic in the Whakatāne Commercial Boat Harbour access channel and the vessel wakes propagating across the silt banks in the remainder of the river channel.

These young folk are trainees and up-and-coming champions. One of their mentors, Dame Lisa Carrington, also a EBCRC member and club executive board member, trains with them on this river space for at least 4 weeks of the year.

They use K1 flatwater kayaks which are simply unmanageable in waves > 150mm. This is a critical safety issue.

Like the Yacht Club, EBCRC have not been consulted by the applicant on the effects of the proposed access channel operation, navigational marking, and maintenance. These two organisations are affected to a greater extent than the other sporting groups who supposedly have been consulted.

Draft consent condition **1.2.3. Community Liaison** mentions neither. EBCRC should have its voice heard in the planning of navigation aids, **4.9 Navigational Aids**.

2.0 REQUESTED CHANGES

1.2.3 Community Liaison Group	Add Eastern Bay Canoe Racing Club and Whakatane Yacht Club
4.9 Navigational Aids	4.9.1 Add Eastern Bay Canoe Racing Club
5.2 Dredging – Methods.	5.2.1 d. Delete jetting or agitating pumps
	5.2.2 Delete clause entirely
5.3 Dredging – Operating Times.	5.3.1 Delete c. Disking
	And Replace with c. Dredging must not be undertaken when river currents exceed 1.0 knot at the dredging location.
5.5 Dredging – Land-based Management	Delete 5.5.1 Advice Note re: diskings

5.6 Dredging – Monitoring

5.6.2 replace “distant” with “downcurrent”

5.6.3 specify frequency/ timing of test, (daily on an outgoing tide during dredging operations)

5.6.5 delete and replace with “5.6.5 Once daily that dredging occurs in the main channel between March to August (inclusive), the consent holder shall (on an outgoing tide during dredging operations), take a water sample at a point 500 metres up stream of the dredging position and a point 200 metres downstream of the position. These samples shall be analysed as soon as practicable for suspended solids concentration.”

5.6.6 add “5.6.6 The consent holder must:

- a. Supply the water clarity measurements required under Conditions 5.6.3, 5.6.4, and 5.6.5 of this coastal permit to the Regional Council no later than two (2) working days after receiving the results; and**
- b. Include the water clarity measurements in the Annual Performance Report prepared for the subsequent year of Boat Harbour operations after the dredging campaign.**

3.0 CLOSURE

Please do not hesitate to contact the undersigned should you require any clarification.

Jim Williamson
Commodore



per Barry Cutfield
Marina Manager



SPORT



STAR SHOWING: The group of Eastern Bay Canoe Racing Club paddlers and coach Gary Waller, centre, who medalled at the New Zealand Canoe Sprint Nationals last month.

Photo Troy Baker E2287-08

Paddlers produce superb showing

Brayden Lindsay
Sport reporter

STAGGERING – that’s the easiest way to describe the recent efforts of the Eastern Bay Canoe Racing Club.

At the New Zealand Canoe Sprint Championships at Lake Karapiro last month, the small Eastern Bay club had every reason to smile.

It punched well above its weight and won a staggering 33 medals at the three-day event – eight gold medals, 14 silvers and 11 bronze.

Dame Lisa Carrington, who commonly paddles under the club banner, won three gold medals.

Usually, her medals would have gone towards the club’s tally, and would have moved it into the top five, but on this occasion, Carrington was part of the Canoe New Zealand High Performance squad.

At under-18 level, the Eastern Bay club finished second overall.

Coach Gary Waller was over the moon

with how the squad performed.

“I am super proud of how they all went. For many of them it was their first time competing at something like this, so to do as well as they did was just awesome.”

“I encouraged them to do as many races as possible, because it helps to get that in-boat experience.”

“I know we surprised quite a few of the bigger clubs there and caught them off guard.”

“While not all our paddlers earned medals, they can be super proud of how well they did.”

For Waller, a couple of performances in particular stood out.

“Ollie Fredericksen was superb; he had a tough schedule but just jumped in a boat and went back out there and raced. He did well, as did Holly Rowland; she was in top form on the water along with some of my more experienced paddlers.”

“Everyone shone.”

In the team events, the Eastern Bay juniors dominated making numerous

finals and podiums.

The team support and challenge to be better even saw 11-year-old Dom Rowland, who had an outstanding three-days, compete in an under-18 race with some of the club’s older members.

As expected, Carrington won her K1 200m race with relative ease but the Olympic champion was upset by world champion Aimee Fisher in the K1 500m.

That result saw a best-of-three races take place, with the winner earning a spot at the world championships later in the year.

Carrington won the next two races to earn that spot.

Waller, who was also busy officiating at the nationals, said the Government’s decision to move to orange light proved beneficial.

“It meant the team could walk along the bank and support each other rather than sit in a corner. It also meant we could interact with others while we were there.”

He sees a lot of potential coming

through and is excited to see what the next few years hold.

Holly picked up five gold medals for her deeds in the under-14 section, while brother Dom picked up two golds and three silvers.

Others to claim a swagger of medals included under-16 paddlers Eva Fuller and Hannah Baxter, who faced off in the under-16 K1 200m and 500m finals. Eva won and Hannah finished third.

Another, who did well was under-12 paddler Scarlett Baxter, who was competing in her first national championships. She came away with two bronze medals and narrowly missed a third.

It was the first time Michael Esterhuizen and Leon Fuller had competed in the open divisions and both did well in making it on to the podium.

Four of the club’s paddlers have since been selected in New Zealand teams to attend the Asia Pacific Championships later in the year; Eva, Hannah and Ollie in the under-16 section and talented under-18 paddler Jess Cleghorn.