

Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

jill waterman

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Section 32 Integrated transport

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

What a dangerous area to add more traffic. This part of Ashwprths rd is terrible now to navigate. This wld introduce more accidents, and the way roading funding is now it would not be addressed for many years. The roading layout and widening needs addressing before this could be contemplated...you are doing cart before the horse and endangering lives knowingly if this goes ahead

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

This site for subdivision not to be allowed to go ahead.

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Contact details for submitter

Address: *

Street Address

16 Elizabeth square

Address Line 2

City

Leithfield Beach

State / Province / Region

North canterbury

Postal / Zip Code

7446

Country

New Zealand

Phone number:**Email: ***

jillyw@outlook.co.nz

Contact person:

Name and designation if applicable

Jill

Note to submitter:

The closing date for serving submissions on the consent authority is the 20th working day after the date which notification is given **(5pm Friday 7 August 2026)**.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

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To: Hurunui District Council

Name of submitter: *

teresa erceg

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

the proposed rezoning of agricultural and to residential proposed by the Hurunui council...rosewood estate and the proposed relocation plan for amberley beach

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

I oppose the proposed relocation plan and the change of prime agricultural land to residential to be carved up for a housing development and relocation area for Amberley beach residence. Amberley beach residence and rate payers' association are concerned with about the coastal adaptation plan CAP. It is based on extreme climate concerns and were line with recent govt announcement noting extreme climate concerns scenarios which shouldn't be treated as most likely future for decisions about infrastructure, investment, land use, property rights or justification of rezoning productive land. Please reject the rezoning of rosewood to residential. it is a large amount of money 3.8 million for rate payers to have to pay back if rezoning is not successful. We are angered by this as we at Amberley beach have never requested to be relocated as the council have stated .it was not democratically voted on being one hand required for them to go ahead with the purchase. Nor did we ever request to be relocated outside of the Amberley township. The rezoning plan change 7 is all the doing of the Hurunui District Council. The beach community have peace of mind with the self-funded coastal bund and renourished when required. Our Houses can have insurance for natural disaster so we can make the decision to move if the worst scenario arises. We do not agree to be the excuse / nor be the pawns in the Hurunui council land banking exercise at the expense of prime agricultural lands and our wallets!

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter

Address: *

Street Address

10 chamberlain ave,amberley beach

Address Line 2

City

amberley

State / Province / Region

hurunui

Postal / Zip Code

7481

Country

New Zealand

Phone number:

274,833,737

Email: *

t.s.erceg@gmail.com

Contact person:

Name and designation if applicable

Note to submitter:

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- it discloses no reasonable or relevant case:
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HURUNUI DISTRICT COUNCIL FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date: 22 July 2026

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

Plan Change 7 – Rosewood Terrace

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

1. Submitter details:

Name/s: (Full name) Robert Thompson

Contact person: Robert

Designation:

Address for service: 31 Chamberlain Drive Amberley Beach

Email address: robert@irt.nz

Telephone: 0274319332

2. For the purposes of section 308B of the Resource Management Act 1991:

☐ I am a trade competitor, and I am ☐ or I am not ☒ directly affected by an effect of the subject matter of the submission that:

(a) Adversely affects the environment; and

(b) Does not relate to trade competition or the effects of trade competition.



I am not a trade competitor

3. The specific provisions of the proposal that my submission relates to are:

Attached

4. My submission is in ☒ support ☐ opposition (tick applicable)

Include whether you support, oppose or are neutral to specific parts of the application or wish to have them amended and provide reasons for your views. This may be provided on a separate sheet if you need more space.

Attached.

5. I seek the following decision from the consent authority:

Please give precise details, including the general nature of any conditions sought.

Attached.

6. Hearing:

I wish to be heard in support of my submission: YES ☒ NO ☐

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☐ NO ☒

Notes:

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 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

The specific provisions of the proposal that my submission relates to are:

This submission relates to the whole of Plan Change 7 – Rosewood Terrace, including:

1. the proposed rezoning of part of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone;
2. the proposed Outline Development Zone overlay and associated Outline Development Plan;
3. the provisions, policies, rules, explanatory material and implementation framework associated with the proposed rezoning;
4. the stated purpose of the plan change, being to enable the proactive relocation of the Amberley Beach settlement due to natural hazard risks;
5. the proposed residential development capacity and layout shown in the Outline Development Plan;
6. any provisions, policies, rules or implementation mechanisms that affect the timing, process, triggers, staging, allocation, or practical implementation of any relocation of Amberley Beach residents; and
7. any Council decision, resolution, policy, agreement, implementation plan, development agreement or associated document that may affect whether Amberley Beach residents can remain together, or substantially together, as part of the existing Amberley Beach / Amberley community.

My submission is in support

Tick: Support

I support Plan Change 7 – Rosewood Terrace, subject to the amendments and clarifications set out in this submission.

The proposal is a positive and necessary planning response to the long-term risks affecting the Amberley Beach settlement. The notified material records that Amberley Beach is subject to multiple hazards, including coastal erosion and inundation, fluvial and pluvial flooding, and rising groundwater. It also records that the purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement in a manner that is cost neutral to the wider community and sensitively located within, and integrated with, the surrounding environment.

I support the principle of creating a planned, local, residential option for Amberley Beach residents. A proactive planning response is preferable to a reactive approach

that occurs only after a significant hazard event, infrastructure failure, access issue, insurance issue, or other crisis has already affected residents.

However, my support is conditional on the relocation framework being made clearer.

The plan change should not simply rezone land and leave the affected community uncertain about what happens next. In particular, the plan change should be amended or supported by formal Council commitments to ensure:

1. the triggers for any relocation process are clear, objective, evidence-based and publicly available;
2. relocation is not treated as automatic merely because the land has been rezoned;
3. affected Amberley Beach residents are consulted before any relocation process is activated;
4. Council clearly states whether relocation is voluntary, and if not, precisely identifies the legal basis and threshold for any non-voluntary step;
5. the existing Amberley Beach community is kept together, or substantially together, wherever reasonably practicable;
6. existing Amberley Beach residents are given a clearly defined priority pathway to relocate into the proposed Rosewood Terrace development if relocation becomes necessary or desirable; and
7. the implementation framework protects community continuity, affordability, transparency and fairness.

The Rosewood Terrace proposal should not be treated merely as a residential subdivision. Its stated purpose is connected to the future of an existing community. The Amberley Beach settlement is not just a collection of individual properties. It is an established community with local identity, neighbour relationships, social connections, informal support networks and a shared connection to place.

For that reason, the plan change should expressly recognise that successful relocation means preserving the community, not simply creating residential lots.

Reasons for support, subject to amendment

I support the rezoning because it provides a practical and local option for the long-term future of Amberley Beach residents. It is appropriate for Council to plan ahead where an existing settlement faces recognised natural hazard risks.

The notified form records that the rezoning would enable approximately 230 residential lots. The Outline Development Plan shows a planned development layout for the proposal. That planning opportunity should be used to ensure Amberley Beach residents have a realistic, fair and community-focused pathway if relocation is required.

However, residents need certainty. At present, the proposal would be strengthened by clearer provisions explaining when relocation would be triggered, what evidence would be required, who would make the relevant decision, what consultation would occur, and what protections would apply to affected residents.

Without clearer triggers, there is a risk that the rezoning itself may create uncertainty. Residents should not be left unclear about whether the rezoning means relocation is expected, encouraged, required, or merely enabled. The plan change should make that distinction plain.

The plan change should therefore include or be supported by objective relocation triggers. These should not be vague or discretionary. Words such as “when necessary”, “when appropriate”, “when required”, or “when risks increase” are not sufficient unless they are tied to measurable criteria, technical evidence, public reporting and community consultation.

The triggers should include matters such as:

1. updated technical hazard assessments identifying a material increase in risk to life, property, access, essential services, infrastructure or habitability;
2. measurable coastal erosion, inundation, flooding, groundwater or other natural hazard thresholds;
3. material compromise or repeated failure of essential infrastructure, including road access, stormwater, wastewater, water supply, emergency access or other servicing;
4. formal advice from appropriately qualified independent experts that continued occupation of affected areas presents an unacceptable or materially increased risk;
5. statutory, regulatory, insurance, infrastructure or access constraints that materially affect residents’ ability to continue living safely and sustainably at Amberley Beach;
6. a formal Council resolution based on publicly available reporting and technical evidence;
7. direct consultation with affected Amberley Beach residents before any relocation pathway is activated; and

8. staged implementation, recognising that not all properties or households may be affected in the same way or at the same time.

It should also be clear that rezoning the Rosewood Terrace land is an enabling measure. It should not, by itself, mean that residents must relocate, or that relocation has already been determined.

The Council should also formally commit to taking all reasonable steps to keep Amberley Beach residents within the current Amberley Beach / Amberley community. That commitment should be reflected in the plan provisions, Council decision, implementation framework, allocation policy, development agreement or other formal document.

That commitment should include:

1. priority access or a clearly defined allocation pathway for affected Amberley Beach residents;
2. staging that allows residents to relocate together, or in groups, where they wish to do so;
3. development design that supports community cohesion, accessibility, walkability and neighbour relationships;
4. recognition of older residents, vulnerable residents, residents on fixed incomes and residents who may face financial barriers to relocation;
5. transparency about infrastructure, servicing, rating impacts, development contributions, lot pricing and any other resident costs;
6. ongoing consultation with Amberley Beach residents on the design, staging, allocation and implementation of the relocation pathway; and
7. express recognition that the purpose of the proposal is not only to provide land for housing, but to protect and continue an existing community.

5. I seek the following decision from the consent authority:

I seek that Hurunui District Council approve Plan Change 7 – Rosewood Terrace, subject to amendments, clarifications and associated Council commitments that address the matters raised in this submission.

In particular, I seek the following decision:

1. Retain the proposed rezoning of the relevant part of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone.

2. Retain an Outline Development Plan framework for the Rosewood Terrace development.
3. Amend the plan change provisions, policies, rules, explanatory material, Outline Development Plan provisions, or associated implementation documents to make clear that the rezoning is an enabling measure and does not, of itself, require the relocation of Amberley Beach residents.
4. Include clear, objective and evidence-based triggers for any Council decision to initiate, recommend, facilitate, or materially advance the relocation of Amberley Beach residents.
5. Require that any relocation trigger be supported by current technical evidence, publicly available information, and direct consultation with affected Amberley Beach residents.
6. Require Council to consult directly with Amberley Beach residents before any relocation pathway is activated.
7. Require Council to clearly state whether relocation is voluntary and, if not, to identify the legal basis, decision-making process and threshold for any non-voluntary relocation step.
8. Include a staged implementation framework that recognises that different parts of Amberley Beach may face different hazards, different timing issues, and different levels of risk.
9. Include a formal commitment that Council will take all reasonable steps to ensure that Amberley Beach residents are able to remain within the current Amberley Beach / Amberley community.
10. Provide existing Amberley Beach residents with priority access, or a clearly defined allocation pathway, within the Rosewood Terrace development if relocation becomes necessary or desirable.
11. Ensure that the design, staging and allocation of the Rosewood Terrace development supports community cohesion, neighbour relationships, accessibility and continuity of the existing Amberley Beach community.
12. Require transparent reporting to affected residents on infrastructure costs, servicing, rating impacts, development contributions, lot pricing, affordability measures and any resident contribution requirements.
13. Require any implementation or relocation framework to recognise the circumstances of older residents, vulnerable residents, residents on fixed incomes and residents who may face practical or financial barriers to relocation.

14. Require Council to adopt or publish a relocation implementation framework before any relocation pathway is activated.
15. Make any further, alternative or consequential amendments necessary to give effect to this submission.

Hearing

I wish to be heard in support of my submission: YES

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES

Robert Thompson.

0274319332.

Robert@irt.nz

Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

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To: Hurunui District Council

Name of submitter: *

C L Ford

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Amberley doesn't need more sub divisions and added costs for all us rate payers

Council should be looking at supporting existing ratepayers in Amberley with new services and pedestrian crossings

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

Against it due to the fact we as rate payers have already had a hefty rates increase this year.

We already have sub divisions with unsold sections

The council have no expertise in this and will likely incur extra costs that will be passed onto the ratepayers. We can't even get a safety crossing in town so why on earth agree to this development !

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

The proposed development should be squashed and not go ahead.

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter

Address: *

Street Address

32 Benn St

Address Line 2

City

Amberley

State / Province / Region

Canterbury

Postal / Zip Code

7481

Country

New Zealand

Phone number:

212,623,943

Email: *

macfod@icloud.com

Contact person:

Name and designation if applicable

Chris Ford

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- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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23 JUL 2026

HURUNUI DISTRICT COUNCIL FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

BY: _____



Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date: 23/7/27

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

Plan Change 7 – Rosewood Terrace

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

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1. Submitter details:

Name: (Full name) Colin McCulloch Black

Contact person: Colin Black

Designation: Self Employed

163 Racecourse Road, RD2, Amberley 7482

Email address: agri-engineering@xtra.co.nz

Telephone: 0275 323231

2. For the purposes of section 308B of the Resource Management Act 1991:

☐ I am a trade competitor, and I am ☐ or I am not ☐ directly affected by an effect of the subject matter of the submission that:

- (a) Adversely affects the environment; and
- (b) Does not relate to trade competition or the effects of trade competition.



I am not a trade competitor

3. The specific provisions of the proposal that my submission relates to are:

I oppose all provisions that:

- Rezone rural land to **Residential 1 Zone**
- Introduce an **Outline Development Zone**
- Enable subdivision for approximately 200–230 residential lots
- Remove or weaken rural zoning protections
- Introduce new rules, exemptions, or non-complying triggers to facilitate residential development on rural land

4. My submission is in ☐ support ☒ opposition (tick applicable)

Include whether you support, oppose or are neutral to specific parts of the application or wish to have them amended and provide reasons for your views. This may be provided on a separate sheet if you need more space.

I/we oppose Plan Change 7 in its entirety.

The reasons for my/our opposition are set out below.

1. Highly Productive Land – Loss of Rural Capability

The plan change would convert a large area of rural land—currently zoned for productive use—into residential lots (approx. 200–230 lots). This directly conflicts with the District Plan’s intent to protect rural land for long-term productive use and avoid unnecessary conversion to urban zoning. The Council itself acknowledges that **productive land status** is a key matter to be weighed by commissioners.

Key concerns:

- **Permanent loss of highly productive land:** Once rezoned and subdivided, this land cannot be returned to rural production.
- **Contradiction with national direction:** Government guidance has recently emphasised that **extreme climate scenarios should not be used to justify rezoning highly productive land**, and councils must rely on robust evidence and independent scrutiny.
- **No demonstrated necessity:** The plan change is framed as “proactive relocation,” yet the Council acknowledges uncertainty about future hazard timelines. The proposal is therefore premature and not justified by immediate need.

2. Reverse Sensitivity Effects on Existing Rural Landowners

Rezoning rural land to residential introduces new residents who may be unfamiliar with rural activities, creating **reverse sensitivity** pressures on established farming operations.

Specific risks:

- **Complaints about noise, dust, odour, heavy machinery, and early-morning operations** typical of rural production.
- **Pressure on Council to impose new restrictions** on farming activities to “protect” residential amenity.
- **Conflict with District Plan objectives** that seek to maintain rural character and enable ongoing agricultural activity without urban constraints.

The proposed Outline Development Zone and Residential 1 zoning would place hundreds of new dwellings directly adjacent to active rural land uses, creating unavoidable conflict.

3. Inadequate Evidence for Climate-Driven Relocation

The plan change is justified primarily based on coastal hazard risk at Amberley Beach. However:

- The Amberley Beach Residents’ Association has raised concerns that the adaptation plan relies on **extreme climate scenarios**, which Government has recently stated should **not** be treated as the most likely future for land-use decisions.
- The Council’s own consultant acknowledges that assessments show the site is “appropriate provided effects are mitigated,” which is not a strong justification for rezoning highly productive land.
- The proposal is described as a “concept” still needing to work through implications. This is not sufficient certainty to justify rezoning rural land.

The relocation rationale is therefore **not robust enough** to outweigh the significant adverse effects of converting productive rural land to residential.

4. Conflicts with District Plan Objectives and Rural Zoning Purpose

The Hurunui District Plan seeks to:

- Protect rural land for long-term productive use
- Avoid sporadic or ad-hoc residential expansion into rural zones
- Maintain rural character and avoid land-use conflicts
- Ensure subdivision occurs in appropriate, planned locations

PC7 contradicts these objectives by:

- Creating a large, standalone residential enclave in a rural setting
- Introducing urban density incompatible with surrounding land uses
- Requiring new rules, exemptions, and special provisions (e.g., removal of staging limits, new yard rules, non-complying triggers) to force residential development into an area not suited for it

This demonstrates that the land is **not naturally appropriate** for residential zoning under the District Plan framework.

5. Economic and Community Impacts

The Council intends to sell remaining sections on the open market to cover costs of land purchase and plan change process. This creates:

- **Commercial pressure** to approve the plan change regardless of planning merit
- **Risk of urban sprawl** driven by financial motives rather than sound land-use planning
- **Potential inequity** for neighbouring landowners who bear the burden of reverse sensitivity and loss of rural amenity

5. I seek the following decision from the Council:

Please give precise details, including the general nature of any conditions sought.

I request that the Hearings Panel:

1. **Decline Plan Change 7 in full**, retaining the Rural Zone over the site.
2. **Require Council to reassess relocation options** using updated, evidence-based climate hazard modelling.
3. **Protect highly productive rural land** from unnecessary rezoning.
4. **Avoid reverse-sensitivity conflicts** by keeping residential development within existing urban zones or areas already identified for growth.
5. **Ensure future planning decisions align with District Plan objectives** for rural land protection and sustainable development.

Plan Change 7 is not justified, not aligned with the District Plan, and not supported by robust evidence. It would permanently remove highly productive rural land, create significant reverse-sensitivity issues for neighbouring landowners, and introduce urban development into an area not suited for it. For these reasons, I strongly oppose PC7 and request that it be declined.

6. Hearing:

I wish to be heard in support of my submission: YES ☒ NO ☐

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☒ NO ☐

Notes:

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- Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

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HURUNUI DISTRICT COUNCIL FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date: 27-7-26

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

Plan Change 7 – Rosewood Terrace

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

1. Submitter details:

Name/s: (Full name)

Gerard McNeill

Contact person:

Gerard McNeill

Designation:

Address for service:

8 Ger Grierson Av Amberley Beach
I am a resident of Amberley Beach

Email address: grd.mcneill@hdc.org.nz

Telephone: 0224630063

2. For the purposes of section 308B of the Resource Management Act 1991:

☐ I am a trade competitor, and I am ☐ or I am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) Adversely affects the environment; and

(b) Does not relate to trade competition or the effects of trade competition.



I am not a trade competitor

3. The specific provisions of the proposal that my submission relates to are:

4. My submission is in ☒ support ☐ opposition (tick applicable)

Include whether you support, oppose or are neutral to specific parts of the application or wish to have them amended and provide reasons for your views. This may be provided on a separate sheet if you need more space.

I support Rosewood new subdivision & want
the new land

5. I seek the following decision from the consent authority:

Please give precise details, including the general nature of any conditions sought.

When do we get new land so we can make
Plans to move

6. Hearing:

I wish to be heard in support of my submission: YES ☐ NO ☒

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☐ NO ☒

Notes:

- The closing date for serving submissions on the consent authority is the 20th working day after the date on which notification is given (**5pm Friday 7 August 2026**).
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 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
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30 July 2026

Hurunui District Council
PO Box 13
66 Carters Road, Amberley
New Zealand
7441

Dear Planning Team,

Canterbury Regional Council submission on Plan Change 7 – Rosewood Terrace

Canterbury Regional Council (**CRC** or the **Regional Council**) appreciates the opportunity to provide a submission on the notified private plan change request.

Overall, the Regional Council is supportive on the application. The purpose of our submission is to:

- Note the relevant objectives and policies in the Canterbury Regional Policy Statement (CRPS).
- Note that activities occurring as part of the proposed subdivision may require resource consent under the Regional Council's Canterbury Land and Water Regional Plan (LWRP), and the Canterbury Air Regional Plan (CARP).

The reasoning for our submission is set out below.

Yours sincerely,



Amanda Thompson
Team Leader, Strategy and Planning

Notice of Submission on a Private Plan Change – Hurunui District Council

Submission made by electronic means

1. SUBMITTER DETAILS

Name of Submitter: Canterbury Regional Council

Physical Address: 200 Tuam Street

Postal Address: PO Box 345

Email Address: regional.planning@ecan.govt.nz

2. APPLICATION DETAILS

Application Reference Number: Plan Change 7 – Rosewood Terrace

Application Site Address: 185 Ashworths Road, Amberley

Description of the Proposed Activity: The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

3. SUBMISSION DETAILS

This is a submission on the council-initiated plan change to the Hurunui District Plan, titled Plan Change 7 – Rosewood Terrace.

We submit in support of this proposed plan change.

Environment Canterbury could not gain an advantage in trade competition through this submission.

The reasons for our submission are:

- 3.1. Overall, the Canterbury Regional Council (**CRC**) is supportive of Plan Change 7 (**PC7**). However, we note that based on the information provided by the applicant, there may be requirements for resource consents under relevant regional plans administered by CRC.

Alignment with the Canterbury Regional Policy Statement

- 3.2. The Canterbury Regional Policy Statement (**CRPS**) provides the high-level planning framework to ensure integrated, sustainable, and consistent management of Canterbury's environment and resources across all local authorities. It plays a central role in shaping how natural and built environments are protected, used, and developed in the region.
- 3.3. The proposal is generally consistent with the objectives and policies within the CRPS, as set out below.

Objective 5.2.1 Location, Design and Function of Development (Entire Region)

- 3.4. The application notes that the rezoning would create a consolidated area for development by relocating an existing, separate settlement rather than establishing a new one. Although the site is not adjacent to an existing urban area, it is considered consistent with the policy intent because the relocation is necessary to address natural hazard risk while maintaining the distinct identity and community of Amberley Beach. CRC is supportive of this assessment.

Objective 5.2.3 Transport Network (Wider Region)

- 3.5. The application confirms the change in traffic patterns and additional traffic resulting from PC7 can be accommodated into the surrounding transport network. As such, CRC considers the proposal consistent with Objective 5.2.3.

Policy 5.3.1 Regional Growth (Wider Region)

- 3.6. As per the assessment under objective 5.2.1, while the proposed site is not attached to an existing urban area, the relocation is necessary to address natural hazard risk and the proposal seeks to maintain and enhance the sense of identity and character of the community of Amberley Beach, while also taking the opportunity to improve amenities and safety.

Policy 5.3.5 Servicing development for potable water, and sewage and stormwater disposal (Wider Region)

- 3.7. The application notes how potable water, sewage and stormwater disposal will be managed. Provided the necessary regional consents are obtained, CRC considers this policy can be adhered to.

Policy 5.3.7 Strategic land transport network and arterial roads;

- 3.8. As per the assessment under Objective 5.2.3, CRC considers this policy is consistent with the proposal.

Objective 9.2.1 Halting the decline of Canterbury's ecosystems and indigenous biodiversity and Policy 9.3.4 Promote ecological enhancement and restoration

- 3.9. As highlighted in previous advice provided to the Hurunui District Council in relation to this plan change, CRC prefers for an ecological assessment to be undertaken in relation to any existing indigenous vegetation, and input by an ecologist into the proposed Mitigation Planting Guidelines. This will help confirm the proposal is consistent with Objective 9.2.1 and Policy 9.3.4.

Objective 11.2.1 Avoid new subdivision, use and development of land that increases risks associated with natural hazards.

- 3.10. As noted below, CRC Natural Hazards Science staff have reviewed Appendix E – Preliminary Geotechnical Appraisal and no natural hazards have been identified on the proposed site.

Objective 11.2.3 Climate change and natural hazards

- 3.11. The primary purpose of the rezoning is to facilitate the relocation of Amberley Beach residents who are exposed to natural hazard risk. As the proposal enables this relocation, CRC considers that it supports the intent of the objective and is therefore consistent with it.

Natural Hazards

- 3.12. CRC Natural Hazards Science staff have reviewed Appendix E – Preliminary Geotechnical Appraisal. They noted no issues and agreed with its findings.

Regional Council – Resource Consent Requirements

- 3.13. CRC notes that there is not sufficient information to determine whether activities proposed to be undertaken will be provided for as permitted activities under relevant regional plans and national environment standards.

Canterbury Land and Water Regional Plan (LWRP)

- 3.14. Confirmation is needed as to whether site dewatering will be required, and whether there will be groundwater interception. Resource consents may be required under the LWRP. The application notes that based on an initial geotechnical assessment, groundwater levels are greater than 10m below the plateau levels. I note there is no groundwater level data on the site within our internal desktop systems.
- 3.15. As noted in the application, the site is located outside of the existing global stormwater discharge consent held by the Hurunui District Council (CRC082988). The site has not been identified as potentially contaminated on the listed land use register nor is within a Community Drinking-water Protection Zone. As such, the discharge of construction phase stormwater may be a permitted activity, provided the rest of the conditions of rule 5.94A can be met.
- 3.16. As the operational-phase stormwater would be generated from more than five sites, the discharge would not comply with Rule 5.96. Consequently, the operational-phase stormwater discharge is likely a discretionary activity under Rule 5.97.
- 3.17. As noted in the application, the sites wastewater discharges are proposed to be routed to the Amberley townships main sewer outfall crosses Hursley Terrace Road 500m north of the development area. The application notes that this network has capacity for the proposed development. The application notes that detailed design will determine whether pumping will be required to lift wastewater from lower areas of the plateau to the discharge route, and topographic survey undertaken prior to detailed design will determine the most efficient mechanism for routing the 5 outfall, whether it be gravity sewer or a pumping main. Provided that the Hurunui District Council Consents Engineer has reviewed the information and agrees with the proposed approach, including the acceptance of wastewater into the Council's treatment system, the proposed approach would likely comply with the permitted activity rule in the LWRP.
- 3.18. However, if the Hurunui District Council does not accept this approach, a separate resource consent for on-site wastewater treatment and discharge would be required.
- 3.19. The proposed earthworks on site will need also need to be assessed against the earthworks over aquifer rules from the LWRP (see LWRP rules 5.175 to 5.178).

Canterbury Air Regional Plan

- 3.20. Any discharges to air (of dust for example) will also need to be assessed in accordance with the Canterbury Air Regional Plan, although CRC considers that these can likely be complied with.

Conclusion

- 3.21. In summary, CRC is supportive on the application as it supports the relocation of the Amberley Beach residents currently subject to natural hazard risk but notes that there may be resource consent requirements under the relevant regional plans noted above when the subdivision application is received and will require further consideration at that stage.

4. SUBMISSION AT THE HEARING

We **do not** wish to be heard in support of our submission

5. SIGNATURE

Team Leader Planning & Strategy

30/07/2026



Amanda Thompson

Form 5 - Submission on notified plan change proposal

Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

William and Hilary Turnbull

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

The proposal as a whole.

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views.
You can upload supporting documents below.

We oppose plan change 7 in its entirety

The reasons for our opposition are set out below

1...Transport network including Ashworths Road, Hursley Terrace Road and Newcombes road.

The proposed rezoning of agricultural land to residential use will result in a significant increase in traffic on Hursley terrace Road. This will add significant safety hazards, particularly at key intersections.

The intersection of Hursley Terrace Road and Newcombes road is already difficult and potentially dangerous.

Vehicles turning right onto Hursley Terrace Road have restricted visibility to the left due to a slight rise in the road and heavy roadside vegetation. Increased traffic volumes will make it much harder to safely judge approaching vehicles.

The intersection of State Highway 1 onto Hursley Terrace Road also presents serious safety concerns. Vehicles turning right onto Hursley Terrace Road from State Highway 1 are currently required to wait in the traffic lane, as there is no dedicated right turn bay or refuge area. There is also limited space for through traffic to pass on the left. An increase in residential traffic will only worsen these issues and increase the risks of accidents.

If the subdivision plan above does go ahead, with Newcombes Road being a narrow shingle road we would like there to be no promotion of Newcombes Road as public beach access, with clear signage of NO BEACH ACCESS, NO STOPPING and NO PARKING.

2...The effect of rezoning highly productive land to residential land has not been properly addressed by the plan change. As neighbouring farmers complaints from new residents unfamiliar with rural life can create real practical and legal pressure on farmers to change how we operate e.g. spraying at certain times, moving stock around roads, lighting burn off fires etc. which can put a restraint on rural productive activity

3...The increased risk of flooding of the low lying land to the east.

The proposed subdivision will significantly increase the area of impervious surfaces, including roofs, roads, driveways and foot paths. We are concerned that the development may increase stormwater flows towards low-lying properties located to the east of the site, potentially increasing the frequency, depth and duration of flooding on existing private land. Even if this issue has been addressed there remains the risk of extreme rainfall events because of climate change that will overwhelm the system that has been put in place.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

We seek that Plan Change 7 be declined, in its entirety.

Upload any supporting documents here:**Do you wish to be heard in support of your submission? ***

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter**Address: ***

Street Address

48 Newcombes Road, RD 1

Address Line 2

RD 1

City

Amberley

Postal / Zip Code

7481

State / Province / Region

Canterbury

Country

New Zealand

Phone number:

273,048,283

Email: *

hilbill@amuri.net

Contact person:

Name and designation if applicable

Hilary Turnbull

Note to submitter:

The closing date for serving submissions on the consent authority is the 20th working day after the date which notification is given **(5pm Friday 21 August 2026)**.

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- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
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Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Carol Carvell

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

This submission relates to the whole of Plan Change 7 – Rosewood Terrace, including:

I own a property at Amberley Beach.

Keeping the land rural

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

My submission is for opposition for Plan Change 7 - Rosewood Terrace in its current form.

I bought a property at Amberley Beach for the lifestyle of relaxation of the beach and the activities that the beach has to offer.

I would move to chch city as its similar to urban living. More amenities available.

I love our community and I chose to live here for my neighbours. I cant pick my neighbours if we have to relocate.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

i would like to see the submission to remain rural mainly due the the lack of consultation and support from the Hurunui District Council.

Has left me unhappy about the hole process of not knowing our future living status.

Out community is a lovely space as it is. Relocation would scatter us everywhere and not be a community as we have it now.

I would like to know more about if the proposal goes to urban if us as home owner would have to pay for relocation of houses and anything else included in moving or building a totally new house. Most of use live in what was once a bach. These werent designed to be uplifted and moved.

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter

Address: *

Street Address

13 South Crescent

Address Line 2

City

Amberley

Postal / Zip Code

7481

State / Province / Region

South Island

Country

New Zealand

Phone number:

273,340,301

Email: *

carolcarvell1@outlook.com

Contact person:

Name and designation if applicable

Note to submitter:

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Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Linda Constable

This is a submission on the following change proposed to the Hurunui District Plan:

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Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

1. Speed of Change
2. Consultation
3. The Mitigation Proposal

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

I am against the Plan Change in its current form. See attached submission

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

- . That the Plan change be paused until-
 1. That the defects in consultation be remedied as described.
 2. That the Plan change not be progressed until the Subdivision Application is advanced concurrently to give residents the information they clearly are seeking and can make informed decisions on the full proposal.
 3. That the opt-in proposal be better explained to residents along with conditions and dates and that the Council prepare a legal template which residents can use to show that an opt-in section becomes part of their estate and that they, or their beneficiaries can inherit it.

Upload any supporting documents here:

PLan 7.docx

11.07KB

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter

Address: *

Street Address

37A Douglas Road

Address Line 2

City

Amberley

Postal / Zip Code

7410

State / Province / Region

Canterbury

Country

New Zealand

Phone number:

212,285,456

Email: *

constable.linda@gmail.com

Contact person:

Name and designation if applicable

Linda Constable

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I am opposed to Plan Change 7 Rosewood Terrace for the following reason which are intertwined and will be further amplified below-

1. Speed of plan Change
2. Inadequate consultation with affected residents.
3. Nature of proposed mitigation for beach residents

I am not a beach resident but an Amberley rate payer who is concerned about the above aspects of the proposal. I have read all the Plan Change documents and the Appendices, The Coastal Adaption Plan, the Managed Retreat and Land Banking Documents, listened to the Public Meeting of 20 July on line and draw my submission from the perspective of “If I were a house owner at the Beach”

1. Speed of Change

It was clear from the July 20 meeting that the vast majority of attendees were anxious for their future, had many question that related to any subdivision application but did not have their questions answered because it is not yet available. They recognised that the plan change was merely to change the zoning of the land from Rural to Residential but felt that they needed the further information that a concurrent subdivision plan would give them, to enable them to better assess the Plan change and the effect on their future decision making.

Given that there is no immediate threat of inundation requiring the population to move, the council should be prepared to pause the process so that the residents can better consider their response. For them this is not merely a Plan Change but the start of what feels to them like a process which will affect their whole future. The fact that the Council has already purchased land makes many consider that the outcome is inevitable.

Some may think this is a vanity project for the HDC to be the first in New Zealand to have dealt with proactive retreat. However that accolade is not worth it if those affected feel feel “hurried”, “forced”, “not sufficiently included in the decision making”.

Another consideration for the speed of the process is the Government’s “Head Start” project to simplify local government whereby there is a three month window for local authorities to design and submit their own regional reorganisation plans, specifically to form new unitary authorities. There is a compulsory government backstop process.

Therefore HDC will no longer exist as an independent governing body. It will be subsumed into a larger council. In September 2026 the Cabinet agrees on the proposals in principle; If there is no change of government in 2026 then in March 2027 final detailed proposals are submitted and the new structures and local elections take place in October 2028.

The Plan Change needs to wait until this matter is decided so as not to cause confusion and further angst in the community. It will also give time for the Subdivision Plan to be developed and consulted on. With both it and the Plan Change developing in tandem, so that all the many questions the community now have can be answered.

2. Consultation

Council documents state

“the proposal responds to an issue that has been well traversed with the community”

I consider that to date the consultation with the residents has been less than adequate.

The draft plan was sent to two adjacent neighbours; a site visit was available for Amberley Beach residents on 19 March 2025

At the July 20 2026 public meeting a Council officer indicated that, in 2023 documentation was sent to all 109 households inquiring whether they would be prepared to make such a move. Only 38 of the 109 households replied, of them 28 were in favour. So only a 35% response overall, and a response of 28% of the resident in favour.

Meetings between the Council and some residents have taken place. The residents have held, at their initiation, a weekend drop-in sessions following the July 20 public meeting for residents to ask questions or share their concerns.

For such an important decision leaflets and public meetings are not enough. I draw your attention to the Bay of Plenty “Community -Led Adaption Funding Initiative”. It enables communities to lead their own climate adaption planning – supporting local people to identify risks, consider responses ,and shape their next steps.. Up to \$20,000 a year is available each financial year to support adaptation planning. One of the matters that this money can be used for is “Community engagement”

I understand from the July meeting that a small group containing the local Resident/Ratepayers Chair and the Mayor is to further consult with the community. No details on how is available. I suggest instead, that the group ,with the financial support of the Council, engage an independent consultant to ascertain the views of each household on the Plan Change, giving the residents an option to move to a future section on land already purchased by HDC

There are companies which specialise in this kind of opinion finding in an unbiased, independent way, leading to the opinions being confidential as to who said what, and the true opinion of that community will be clearer.

People will all have views but are often reluctant to express them in a public forum, due to lack of confidence, being unsure or concerned that the may be “going against everyone else”.

3. The Mitigation Proposal

The HDC has purchased land, being part of a property at 185 Ashworth’s Road, Amberley, currently subject to Proposed Plan Change 7-Rosewood Terrace. It is not commonly known what the purchase price was but the capital value of the whole property was \$3.8m. The land will be rezoned from Rural to Residential.

The Section 32 report states that there is social benefit by providing an option that keeps Amberley residents together, close to the existing settlement and coast and distinct from other Settlements.

There are reportedly 109 residences at the beach. The proposal states that the purchased land can provide for the current 109 and further 121 sections, sold on the open market will mean that the

project is sustainable without recourse to other rate payers. Those extra sections are suggested to sell for \$220k each.

The current 109 are being offered an opt-in proposal whereby for \$1 a day or \$11,000 will guarantee them a section on the new land in due course. The timetable for that is as yet undefined. It is not compulsory to opt-in. People can stay where they are if they choose.. No time-frame for being able to opt-in is available. It was stated at the July 20 meeting they would all be 700m². If different sizes were wanted this had to be negotiated between residents, eg an elderly retired couple indicated that they would want a smaller manageable section.

The sections for current Amberley Beach residents who opt in cannot be chosen, but will be balloted. Subdivisions are usually developed in stages.

Current Beach residents can move their current dwelling to their new section presumably at their transportation cost, having to provide a foundation at their cost and remediating their house if necessary and attachment to services. Given the age of building which were built as batches there may be asbestos problems.

If you choose to opt in, and you have paid \$11,000k then there is no provision for the Council purchasing your current house. You lose all the equity in it. So for elderly and low income residents there will be an inability to raise a mortgage and so building on your new section will not be possible. Meanwhile if you decide to sell your house and move elsewhere the beach property values have already fallen and will continue to do so.

The sting in the tail is that the Council want a clear section with buildings demolished. In the documents they have made this a cost to the home owner. They have suggested the cost is about \$20,000 per section. In the overall Plan change costs this cost is not large for the council to absorb. In fact for every section that the residents chose not to opt-in to the council will have an extra \$220k towards the clearing task.

Q. 1 When is it too late in the process to opt-in?

Q. 2 Will there be one whole developed stage for those current residents who have opted -in or will they be pepper -potted throughout the whole site.

Q.3. What happens if few residents choose not to move and so the objective of keeping the community as one fails.

Q.4. The new section of those who opt-in becomes part of that persons' estate along with their existing home until they build, can they sell the new section?

Q.5. Because elderly people may die before their section is allotted or people have to leave the area because of work changes, The Council, should as part of the process, pay for a legal document template prepared by a competent lawyer, that can show that the section becomes part of the persons estate and can be transferred by will.

Most people wish to leave assets or the proceeds of assets to family members or charities. They need the comfort of knowing that they can do this if they opt-in, conditional on the \$11,000k being met. It would not be costly for the Council to have this prepared rather than up to 109 families individually arranging it, even if it occurs to them.

I am of the opinion that the constrictions described , especially the loss of home equity, will deter many current owners from opting-in. Those that can afford to build may do so, but the fundamental objective of The Amberley Beach Residents remaining as a community will fail.

Plan Change 7 Rosewood Terrace should not proceed. It is flawed in that it may provide a slew of technical information, but does not provide for the wellbeing of the residents in its current form.

Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Lydia Saunders

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

Oppose, not in the best interests of the wider community and infrastructure.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Contact details for submitter

Address: *

Street Address

132 Carters Road

Address Line 2

Amberley 7410

City

Amberley

Postal / Zip Code

7410

State / Province / Region

North Canterbury

Country

New Zealand

Phone number:

279,148,671

Email: *

Lydiajames11@outlook.co.nz

Contact person:

Name and designation if applicable

Note to submitter:

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Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

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To: Hurunui District Council

Name of submitter: *

Margaret Hedge

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Rural/productive land should and must be retained for future food production. If rezoned to residential it will be gone forever. Be sensible, Amberley does not have the infrastructure to absorb this plan, and the cost to the ratepayer is unsustainable. Amberley is a village, not a satellite suburb of Christchurch.

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

Oppose this plan

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter

Address: *

Street Address

31 Courage Road

Address Line 2

Amberley

City

Amberley

State / Province / Region

Canterbury

Postal / Zip Code

7410

Country

New Zealand

Phone number:

21,492,044

Email: *

mhedge1886@gmail.com

Contact person:

Name and designation if applicable

Note to submitter:

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To: Hurunui District Council

Name of submitter: *

Barrie Nunn

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

My submission relates to the overall proposal of the Plan change 7 Rosewood Terrace at 185 Ashworth Road and not regarding one provision, policies or rule changes

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

■

- I oppose the Plan Change
- The plan change purpose is in question as it relies on modelling and assessments the current Government has instructed councils to disregard
- The Plan change has the potential to be used as undesired precedent when other blocks of productive land are being considered for use for alleged Climate or environment reasons. Productive land once built upon will be lost forever
- It is current HDC policy to not build on productive land and there has been no public discussion about the change to that policy
- The timing of this request if forcing a decision where no provable timeline is available to warrant haste, especially when councils are being restructured and will not be around in the current form in a couple of years to deal with the consequences
- The HDC Management of the retreat process has the potential to expose Ratepayers to liability if a class action is taken by Amberley Beach residents who see the value of their properties adversely impacted by HDC implementation of this policy

■

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

- A rejection of the proposed plan to rezone
- A moratorium on any further expenditure by HDC on this plan until the Government restructure is complete

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter

Address: *

Street Address

323

Address Line 2

Georges Road

City

Amberley

Postal / Zip Code

7482

State / Province / Region

Hurunui

Country

New Zealand

Phone number:

2,102,611,005

Email: *

barrie.nunn@hotmail.com

Contact person:

Name and designation if applicable

Note to submitter:

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To: Hurunui District Council

Name of submitter: *

Laura and David Proctor

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Our opposition is also directed at what PC7 actually enables and that it is out of sequence with the implementation pathway the community agreed in the CAP and the managed retreat land banking proposal

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

We own 22 Grierson Ave in Amberley Beach. We bought our home because we loved the area, the open space and the rural character, being able to walk one block to the beach and we saw Amberley Beach as our long-term home and retirement plan.

We simply don't believe this rural land should be rezoned for a development of around 230 houses.

Turning this land from rural to residential will permanently change the character and landscape of the area. What is currently open rural land will become houses, roads, driveways, fencing and infrastructure. We don't believe that is the right outcome for this area.

We understand that there are serious coastal issues affecting Amberley Beach and that Council needs to think about the future. However, we don't believe those issues automatically justify rezoning such a large area of rural land. We do not feel that alternative options have been seriously considered that can support our lovely community to stay where it is rather than relocate also.

Our opposition is also directed at what PC7 actually enables and that it is out of sequence with the implementation pathway the community agreed in the CAP and the managed retreat land banking proposal. No triggers have been met which is what the community that was part of the CAP in 2023 agreed upon so we are wondering why this is even being talked about.

The Coastal Adaptation Plan was developed in 2023. It is now 2026 and the community and circumstances have changed. There have been a lot of new people come into our community, particularly a lot of younger families that chose the beach community for its location and feel. We believe the plan should be properly reviewed and the community consulted again before such a major change to the surrounding landscape is made.

This situation has also had a very real impact on us personally. The uncertainty around the future of Amberley Beach has caused us a great deal of stress. We are worried about the value and saleability of our home. We would not be able to afford to relocate, build a new home and leave our section clear.

We are not against finding a sensible long-term solution for Amberley Beach. We just don't believe that turning rural land into a 230-house residential development is the right solution.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

We respectfully ask Hurunui District Council to decline the proposed rezoning of 185 Ashworths Road from Rural Zone to Residential 1 Zone.

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Contact details for submitter**Address: ***

Street Address

22 Grierson Avenue

Address Line 2

RD 1

City

Amberley Beach

Postal / Zip Code

7401

State / Province / Region

Hurunui District

Country

New Zealand

Phone number:

Email: *

davenlaura@gmail.com

Contact person:

Name and designation if applicable

Note to submitter:

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If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

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To: Hurunui District Council

Name of submitter: *

Christina Bately

This is a submission on the following change proposed to the Hurunui District Plan:

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The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Disagreement with re-zoning from rural to residential.

Disagreement with proposal to move beach residents from the beach to the land

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

I oppose

I do not want to move nor do I have the financial ability to move

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

I oppose the changing from rural to residential and oppose the idea of moving beach residents

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter

Address: *

Street Address

32 chamberlain Avenue

Address Line 2

City

Amberley

State / Province / Region

Canterbury

Postal / Zip Code

7481

Country

New Zealand

Phone number:**Email: ***

christina.bately@gmail.com

Contact person:

Name and designation if applicable

Myself

Note to submitter:

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- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Jessica Caddy

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

This submission relates to the whole of Plan Change 7 – Rosewood Terrace
See attached Document with my Submission

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views.
You can upload supporting documents below.

OPPOSE - See attached Document with my Submission

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

I seek that Hurunui District Council decline Plan Change 7 – Rosewood Terrace

Upload any supporting documents here:

Jessica Caddy PC7 Submission.pdf	209.42KB
Gmail - Coastal Adaptation Plan out now June 2023.pdf	263.51KB
CAP Feedback form May 2023.pdf	732.04KB

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter

Address: *

Street Address

2 South crescent

Address Line 2

Amberley Beach

City

Amberley

State / Province / Region

Canterbury

Postal / Zip Code

7481

Country

NZ

Phone number:

276,661,400

Email: *

scojes2010@gmail.com

Contact person:

Name and designation if applicable

Jess

Note to submitter:

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Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Jessica Caddy

2 South Crescent

Amberley Beach

OPPOSE - I seek that Hurunui District Council decline Plan Change 7 – Rosewood Terrace

- Land use change – if a land use change was to be approved right now and residential properties added to the rural zone, we have a big concern around waste water, stormwater, and accessible clean water not only affecting the properties below the terrace including Rural and Amberley Beach settlement but also the marine life in the lagoon and ocean. We are aware of mistreatment of the waste water plant already affecting a major wetland and large farming property behind the beach settlement.
- The location of the Land is not suitable for the purpose of a relocation. There was no consultation with the Amberley beach residents before this purchase took place, and the following are just a few issues that would affect the surrounding rural and beach property owners at this current time if land change was to go ahead so hastily.
 - Construction to develop the land
 - Motor Traffic on Hursley Terrace road and SH1
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 - Access to local amenities, additional 7kms away from township – including Schools, Doctors, parks, recreation areas – no process to create safe pathways for foot traffic or cycle ways.
- CAP – the triggers pathway are in no way being executed in the way that the community believed they would from the CAP, why is this land use change being made so hastily, we as a community thought it was landbanking until any two or more trigger points were met and then discussions would be had on the next steps. This Land use change is literally skipping to the last page of the book, expecting to know the outcome and then figuring out how to get there.
- Legal Agreement - Referring back to a CAP feedback form from May 2023 – we submitted our feedback on the retreat concept, and reluctantly ticked “**agree in Principle – would like to see a draft agreement**” (You can see a copy of my feedback form emailed to Monique attached.)
 - The HDC have wrongly taken the answers in these feedback forms as agreements to the retreat vs. the feedback that it was– we never saw

anything formalised or legalised after returning this feedback form.

Therefore the wider community is disillusioned that the Beach community has been fully informed during this process, and is in agreement with HDC on a retreat & Land use change in such a rushed format.

- Emails received showed that there would be further engagement regarding the land banking and managed retreat, this was the last email thread I received and I believe there was only a few meetings since where HDC attended at the ABRAC hall – where still no official agreement was made & no formal/legal documents given to the current Homeowners of Amberley beach.
- Retreat – As a future concept, If we as beach owners cannot relocate an existing current dwelling, we must finance both the consent & build on the new land, then also the removal & clearance of the dwelling at the Beach. This is unattainable for us and most of the community, A plan change that is intended to facilitate a relocation should not proceed unless all Beach residents understand the dire financial consequences. A relocation pathway that is technically available but financially inaccessible is not a genuine solution.
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Scott And Jess Caddy <scojes2010@gmail.com>

Coastal Adaptation Plan out now

2 messages

Coastal Communities <coastal@hurunui.govt.nz>

30 June 2023 at 10:23

Hi everyone,

This week the Council adopted the Coastal Adaptation Plan for Amberley Beach. The Plan is a cumulation of all of our discussions over the past 3 years and on behalf of Monique and myself we're grateful to everyone who contributed to the process.

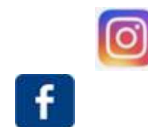
In response to the feedback provided some changes have been made to the Plan, mostly around the triggers. I have attached a copy of the plan with these amended changes shown in red. A 'clean' version of the Coastal Adaptation Plan is available from the [Council website](#).

At this point the proposal for Land Banking and Managed Retreat needs more feedback before any decisions can be made about whether to move ahead. We'll be undertaking further engagement with those we haven't heard from yet. If you haven't provided feedback and would like to have your say, please get in contact with us.

Our focus will now move to implementing the actions in the plan.

Kind regards,

Hannah Shields | *Planner*



Phone: 027 808 9106

**Disclaimer**

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

3 attachments



image001.jpg
4K



image003.png
2K



Amberley Beach CAP - Marked up.pdf
27222K

Coastal Communities <coastal@hurunui.govt.nz>

30 June 2023 at 10:38

Hi everyone,

This week the Council adopted the Coastal Adaptation Plan for Amberley Beach. The Plan is a cumulation of all of our discussions over the past 3 years and on behalf of Monique and myself we're grateful to everyone who contributed to the process.

In response to the feedback provided some changes have been made to the Plan, mostly around the triggers. A full version of the Coastal Adaptation Plan is available from the [Council website](#). If you'd like to see a marked up version of the changes this can be provided.

At this point the proposal for Land Banking and Managed Retreat needs more feedback before any decisions can be made about whether to move ahead. We'll be undertaking further engagement with those we haven't heard from yet. If you haven't provided feedback and would like to have your say, please get in contact with us.

Our focus will now move to implementing the actions in the plan.

Kind regards,

Hannah Shields | *Planner*



Phone: 027 808 9106



hurunui.govt.nz
"Making our district even better"

[Quoted text hidden]

2 attachments



image001.jpg
4K



image003.png
2K

Jessica Caddy

2 South Crescent

Amberley Beach

OPPOSE - I seek that Hurunui District Council decline Plan Change 7 – Rosewood Terrace

- Land use change – if a land use change was to be approved right now and residential properties added to the rural zone, we have a big concern around waste water, stormwater, and accessible clean water not only affecting the properties below the terrace including Rural and Amberley Beach settlement but also the marine life in the lagoon and ocean. We are aware of mistreatment of the waste water plant already affecting a major wetland and large farming property behind the beach settlement.
- The location of the Land is not suitable for the purpose of a relocation. There was no consultation with the Amberley beach residents before this purchase took place, and the following are just a few issues that would affect the surrounding rural and beach property owners at this current time if land change was to go ahead so hastily.
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- Proposal Perception - Approving this plan change makes an assumption that relocation is the preferred or inevitable outcome, even if no triggers are met, this will create unintended consequences with how residents, insurers, purchasers, lenders and others view existing Amberley Beach properties. It will discourage investment in maintenance or improvements. The uncertainty is stressful for us as a young family with a mortgage.

AMBERLEY BEACH COASTAL CONVERSATIONS

FEEDBACK FORM

Your opinion matters. Fill out this form and email to coastal@hurunui.govt.nz or print a copy and post to Hurunui District Council, PO Box 13, Amberley 7410. **Feedback due 12 May 2023.**

Name: Scott + Jess Caddy

Address: 2 South Crescent.

Email or Phone: scojers2010@gmail.com

COASTAL ADAPTATION PLAN

The Amberley Beach Coastal Adaptation Plan belongs to your community. You can recommend changes to the document by annotating the document or by using the comments box on this form.

Implementation questions

When one of the seven trigger points is reached a conversation will start on the next steps. When two of the triggers are reached a decision will be required. The proposed triggers are set out of pages 20 and 21 of the Adaptation Plan and summarised below.

Do you support this trigger being used? Or what would you prefer the trigger to be?

	Support / Oppose?	Requested changes
Toe of backslope of the bund is within 5 metres of the nearest property boundary	oppose	
Cost of bund renourishment rate increases from \$238.60 to \$500 per year	oppose	
First dwelling loses insurance	Support	must be because of direct impact of other remedies not working.
A major event requires over 30 dwellings to rebuild	Support	
Water ponds for more than five days per year at the recording posts	oppose	other remediation required
Significant capital works are required	oppose	these should continue
A contractor is required to be stationed at Amberley Beach for five nights per year for two years in any five-year period	oppose	cost dependant? already happens to open lagoon.

Actions

Actions to support the delivery of the Adaptation Plan are set out on pages 23 to 25. Are there other actions you would like recorded as part of the Plan?

General comments or request changes

- Agree that its an insurance policy to enable the equity in our properties to remain.
- We do not necessarily agree to want to move away from the beach settlement without exhausting all other preventative measures.
- If it goes ahead we want to ensure the best care & support is maintained by council to maintain the beach settlement in regards to land / other & general upkeep of area to be enjoyed by residents & visitors in near & distant future before any retreat was to come into force.

PROPOSAL FOR MANAGED RETREAT AND LAND BANKING

Land banking is a mechanism Council can use to help facilitate managed retreat if required. Alternatively, the revenue generated could support the delivery of longer-term protection options if these are practical and managed retreat is not to be pursued. The full information is set out in the document Amberley Beach: Proposal for Managed Retreat and Land Banking.

If there is sufficient community support Council will get a legal agreement drawn up. This will be provided to you as a draft which we will receive comments on. Once the agreement is finalised you will have the opportunity to opt in or out.

Choose one

☒	Agree in principle – I would like to see a draft agreement
☐	Disagree – I am not interested in being a part of this
☐	I'm really not sure

If you have questions or would like to discuss further please contact Monique at:
coastal@hurunui.govt.nz.

Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Scott Caddy

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

This submission relates to the whole of Plan Change 7 – Rosewood Terrace

See attached Document with my Submission

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

OPPOSE - See attached Document with my Submission

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

I seek that Hurunui District Council decline Plan Change 7 – Rosewood Terrace

Upload any supporting documents here:

Scott Caddy PC7 Submission.pdf

96.02KB

Do you wish to be heard in support of your submission? *

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter

Address: *

Street Address

2 South Crescent

Address Line 2

Amberley Beach

City

Amberley

State / Province / Region

Canterbury

Postal / Zip Code

7481

Country

NZ

Phone number:

276,661,390

Email: *

transportdetailers@gmail.com

Contact person:

Name and designation if applicable

Scott

Note to submitter:

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Scott Caddy

2 South Crescent

Amberley Beach

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 - Construction to develop the land
 - Motor Traffic on Hursley Terrace road and SH1
 - Already mentioned above 3 waters
 - Light pollution and noise levels in a surrounding Rural area
 - Access to local amenities, additional 7kms away from township – including Schools, Doctors, parks, recreation areas – no process to create safe pathways for foot traffic or cycle ways.
 - Windy terrace – Amberley beach residents being told that current dwellings can be relocated, this would not be compliant with current building codes.
- Amberley Township – The capacity & infrastructure is not ready to handle the influx of another subdivision at this size, relating to the 100 odd Market value properties to be sold.
 - Pressure on Medical & Emergency services (Many volunteered)
 - Crime and Police resources
 - Public Transport
 - Schools in zone, Leithfield School's size will become an issue for the surrounding number of families moving nearby

- Public Safety & Road Hazard Management – The Section of SH1 at the intersection of Hursley Terrace Road & also Mill Road is not sustainable for multi traffic movements, The secondary access to the Rosewood land down Hursley Terrace would become a main route for *many*, and already as residents of Amberley Beach, Leithfield and the Rural Land owners know this section of the road is not safe for turning traffic North or South bound when taking into account the Heavy Vehicles and daily commuters at Peak hours.
- CAP – the triggers pathway are in no way being executed in the way that the community believed they would from the CAP, why is this land use change being made so hastily, we as a community thought it was landbanking until any two or more trigger points were met and then discussions would be had on the next steps. This Land use change is literally skipping to the last page of the book, expecting to know the outcome and then figuring out how to get there.
- Legal Agreement – Nothing has been formalised or legalised. Therefore the wider community is disillusioned that the Beach community has been fully informed during this process, and is in agreement with HDC on a retreat & Land use change in such a rushed format.
- Retreat – As a future concept, If we as beach owners cannot relocate an existing current dwelling, we must finance both the consent & build on the new land, then also the removal & clearance of the dwelling at the Beach. This is unattainable for us and most of the community, A plan change that is intended to facilitate a relocation should not proceed unless all Beach residents understand the dire financial consequences. A relocation pathway that is technically available but financially inaccessible is not a genuine solution.
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To: Hurunui District Council

Name of submitter: *

George Forbes and Laura Palomino Forbes

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The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Proposed Plan Change 7 to the Hurunui District Plan (Amberley Beach Proactive Relocation Rezoning), including all plan changes proposed as notified in the Section 32 report.

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

We oppose in its entirety Proposed Plan Change 7 to the Hurunui District Plan (Amberley Beach Proactive Relocation Rezoning), including all plan changes proposed as notified in the Section 32 report.

If Proposed Plan Change 7 is approved in any form, then we request conditions are imposed under s77D(a) of the RMA, requiring mandatory public notification with public submissions for subsequent resource consent applications associated with Plan Change 7.

Our written submissions in opposition are contained in the two PDF documents attached to this electronic submission form. "Final Rosewood Submissions 16 August.pdf" (27 pages); and "Hursley Residents opposition 8 June 2026 (3).pdf" (4 pages).

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

1. That upon receiving all written submissions and considering the same, the Hurunui District Council withdraw Proposed Plan Change 7. Upon withdrawal, for the sake of market certainty, the Hurunui District Council commit not to re-submit a zoning change for the relevant land in connection with Amberley Beach Proactive Relocation.
2. If the request in 1. above does not occur, then Proposed Plan Change 7 to the Hurunui District Plan (Amberley Beach Proactive Relocation Rezoning), including all plan changes proposed as notified in the Section 32 report, be rejected in its/their entirety by the consent authority/commissioner(s).
3. If Proposed Plan Change 7 is approved in any form, then we request conditions are imposed under s77D(a) of the RMA, requiring mandatory public notification with public submissions for subsequent resource consent applications associated with Plan Change 7.

Upload any supporting documents here:

Final Rosewood Submissions 16 August.pdf	491.15KB
Hursley Residents opposition 8 June 2026 (3).pdf	1.73MB

Do you wish to be heard in support of your submission? *

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter**Address: ***

Street Address

38 Garden Road

Address Line 2

Merivale

City

Christchurch

Postal / Zip Code

8014

State / Province / Region

Canterbury

Country

New Zealand

Phone number:

21,338,860

Email: *

georgeforbes.email@gmail.com

Contact person:

Name and designation if applicable

George Forbes

Note to submitter:

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SUBMISSION

Definitions used in submission

“Hursley Terrace Environment” means the natural, man-made, rural and productive environment, situated on, below and around Hursley Terrace (notably around the roads named Hursley Terrace Road, Newcombes Road, Kowai River Road and Crosses Road) situated between Amberley Beach Road and State Highway 1, including the people, livestock, dwellings, roading and infrastructure in this area.

“PC7” means Plan Change 7 including (without limitation) all changes to the Hurunui District Plan proposed by PC7; and, where relevant, PC7 includes reference to the future residential development on the Proposed Site.

“Proposed Site” means the approximately 34 hectares identified in PC7 for the rezoning and later residential development of up to approximately 230 lots.

We oppose Plan Change 7 in its entirety.

The submissions in respect of our opposition are set out below.

Introduction

We are the owners of a small rural property situated on Hursley Terrace approximately 400m from boundary of the Proposed Site. Our property was purchased in 2018 specifically for its rural attributes and environment, as well as providing a link to a deep familial connection in the district, to agriculture and the land. Our rural property comprises a combination of an orchard, livestock, and fodder harvesting, together with substantial native and exotic tree plantings. An integral part of the decision-making with our property has been the positive inter-generational influence that a low-density rural environment has for our family and, in particular, our children, as they develop from children to young adults. While the impacts of PC7 clearly extend widely around the community, an incompatible and dense residential subdivision situated on Hursley Terrace would effectively end the socio-ecological rationale for our land, as it would fundamentally and irreversibly alter the established rural, social and environmental character that is so important to the surrounding community.

Illustrating the opposition to PC7, appended to this submission is a copy of a letter of opposition from residents in the Hursley Terrace Environment to Councillors and Council as on 9 June 2026.

SUMMARY

Definitions

PC7 represents the severe loss of rural socio-ecological character for our property and community.

SUBMISSION

As Council's section 32 report acknowledges, PC7 represents a "*novel approach*" in rezoning and residential development. By its ordinary meaning, "*novel*" denotes an unfamiliar and unconventional approach, inherently carrying greater uncertainty and risk.

Section 32 of the Resource Management Act 1991 ("**RMA**") requires Council's evaluation report to examine whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA and whether the proposed provisions are the most appropriate way to achieve those objectives. This requires Council to identify other reasonably practicable options, assess the efficiency and effectiveness of the proposed provisions, and identify and assess the anticipated environmental, economic, social and cultural benefits and costs of their implementation. The evaluation report must contain a level of detail that corresponds to the scale and significance of those anticipated effects. Each of the sections of this submission conclude that the examination notified publicly under section 32 of the RMA has been insufficient and, we respectfully submit, that it does not meet the heightened analytical rigour or multi-criteria analysis of the evaluation required for this "*novel*" and complex plan change proposal.

PC7 arises from the Council's decision to purchase Rosewood in mid-2025, before completing processes anticipated by its Amberley Beach Coastal Adaptation Plan of June 2023 ("**CAP**"); before completing comprehensive community and development due diligence concerning the proposed project in the Proposed Site; without notifying the Amberley Beach community of the Proposed Site or consulting with residents in the Hursley Terrace Environment; and absent an independent assessment of the proposed project's financial viability.

The Rosewood purchase and near-immediate move to PC7 represents Council's initial steps 'in trade' with a large and complex residential property development. The Council's prior published works in this context are in large part encapsulated in the documents entitled, 'Amberley Beach: Proposal for Managed Retreat and Land Banking', March 2023 (the "**PMRLB**") and the CAP. These underlying public documents contain certain statements and community assurances that risk being undermined by PC7, including:

- (i) Stating in the CAP: "*Council will prepare an engagement document [on land banking] if there is sufficient support from the community to proceed with the proposal.*" the evidence of "sufficient support from the community" is unclear in PC7. Recent anecdotal information from the Amberley Beach community indicates that a substantial majority of residents oppose PC7; and this is also true of residents in the Hursley Terrace Environment.
- (ii) Stating in the PMRLB: "*Council has proposed to partner with the community in a land banking proposal.*" With the Rosewood purchase made, it is unclear what the Council's statement means; and how the community (especially the two communities primarily affected) is a partner with Council in land banking.

SUMMARY

PC7 results in considerable "*novel*" risk.

The section 32 assessment is inadequate.

PC7 has been launched prior to completing community diligence.

Certain statements and community assurances from Council risk inaccuracy.

Rosewood PC7 submissions: George Forbes and Laura Palomino Forbes as trustees, the registered proprietors of 205 Hursley Terrace Road, Amberley.

SUBMISSION

- (iii) Stating in the PMRLB: *“Council will purchase a block of land imminently. This will involve enough land to develop 200 lots. 109 of these will be reserved for Amberley Beach property owners. The remaining 91 lots will be sold at market rate to help fund the overall development costs of the new settlement.”* The number of lots and ratio of outside residents has changed in PC7, materially affecting the anticipated character of the Proposed Site and rationale for PC7.
- (iv) Stating in the PMRLB: *“A Plan Change will be required to the District Plan to enable the new land to be used for residential development. This needs to occur prior to relocation but there is no rush to complete the Plan Change.”* The timing of PC7 relative to the recent Rosewood purchase is self-evident: even allowing for expert report writing, *“no rush”* is now ‘near immediate’. The reasons for the significant timing change are unclear, and Council should state the reasons, including whether impending statutory reform would be impactful.

As evidenced at the 30 June 2026 Council meeting, there is a marked disconnect between Council staff and some Councillors about PC7 and the timing points for future “go/stop” decision-making, both within Council and for the community. Although several Councillors have publicly indicated that PC7 could be paused or discontinued if submissions or further investigations warrant, the land purchase, associated borrowing and preparatory expenditure, together with the significant commitment of Council to race towards PC7, have created substantial institutional momentum. These factors bypass the collective Amberley Beach decision-making process envisaged by past Council consultations and they risk handcuffing future “go/stop” decision-making by Councillors.

Information available since the public notification of PC7, including feedback witnessed at the Council’s public meeting on 20 July 2026, suggests that a substantial majority of Amberley Beach residents and all residents living in the Hursley Terrace Environment oppose PC7 and the proposed residential development. While not all affected residents are expected to lodge opposition submissions, anecdotal evidence suggests this reluctance reflects: (i) concerns about challenging a public authority with regulatory powers; and (ii) general apprehension about participating in a formal submission process.

Implementing PC7 would mark the beginning of the end for the Amberley Beach township. While PC7 may be characterised as “preparation” rather than “implementation”, this distinction is undermined by the scale of Council’s financial and resource-based commitments and the institutional momentum these commitments create. Council’s section 32 report includes the following statement, *“However, it is important to note that the rezoning does not bind Amberley Beach property owners. Property owners can choose whether to opt-in to the proposal. The rezoning will not force current residents to move to the Plan Change Site”*. That statement is true on its face. However, while Amberley Beach residents would retain formal legal choice, PC7 means the practical exercise of that choice would become increasingly constrained by institutional and market forces. Over time, Council would face increasing pressure to reduce infrastructure investment and

SUMMARY

“Go/stop” decision-making capacity by Council is now impaired.

Opposition to PC7 is significant at Amberley Beach and in the Hursley Terrace Environment.

“Voluntary” participation by Amberley Beach residents is unlikely to be “voluntary” over time.

SUBMISSION

service levels in the existing Amberley Beach area. In a settlement identified for managed retreat, particularly where alternative rezoned land is available, insurers may respond by increasing premiums, reducing coverage, or declining to insure properties in Amberley Beach; while banks may become reluctant to provide or renew mortgages on properties. With these pressures, community dynamics over time would create 'network effects' as residents progressively relocated (whether to the Proposed Site or elsewhere) with those remaining facing declining amenity, reduced social networks, and the practical reality that services may become more basic over time and, remaining on-site, may become unsafe or financially unviable. While Amberley Beach residents would retain the formal legal choice that Council describes, implementing PC7 means that the practical exercise of that choice would become increasingly constrained by these institutional and market forces.

Finally, the evaluation of the impact of PC7 on the residents of the Hursley Terrace Environment is absent sufficient rigour. Themes of community consultation and participation are evident in so far as Amberley Beach residents are concerned. However, the 'rush' to PC7 from the time Rosewood was purchased has seen this second affected community in Hursley Terrace Environment largely missed. We are not aware of any professional report authors having interviewed or consulted with any resident in the Hursley Terrace Environment prior to authoring their respective expert reports on the effects of PC7 in that area. This absence of this engagement undermines the quality and accuracy of the effects assessment and contributes to the inadequacy of the section 32 evaluation.

Statutory Duties, Procedural Fairness, and the need for Additional Safeguards

While Council is empowered to initiate plan changes, it is bound by statutory duties under the Local Government Act 2002 to conduct business in an open, transparent, and democratically accountable manner, and to enable effective public participation.

Council is acting as both proponent and advocate for PC7, purchasing land and commissioning, at community cost, multiple technical reports from professional consultants including transport, geotechnical, landscape, economic, and infrastructure assessments, demonstrating significant resource allocation (including borrowing costs) over a preparatory period.

PC7 is separate to the Amberley Beach consultations undertaken over some years. Its notification represents a first publication to the community, including those adversely impacted in the Hursley Terrace Environment. We are concerned that the extensive resources expended by Council, including the technical complexity of supporting materials, combined with the relatively short submission period exaggerates the substantial resource disparity between Council and its community.

PC7 may, if successful, effectively eliminate the need for Council to have further public submissions at the subdivision stage, provided the subdivision is generally in accordance with the Outline Development Plan. With only a short window to prepare these submissions, we consider this factor to be materially prejudicial to

SUMMARY

One severely affected community has been missed from any substantive consideration and consultation.

A substantial resource and experience disparity exists between Council and submitters.

Effective, appropriate and fair participation by the community is limited by several factors.

SUBMISSION

residents in both Amberley Beach and the Hursley Terrace Environment, with the latter group subject also to an absence of prior consultation.

These points raise significant procedural fairness and natural justice concerns, particularly given Council's public role in its community, its duty to separate regulatory decision-making from non-regulatory functions, and to take account of the diversity of the community and varying capacities to participate in complex planning and consenting processes.

We respectfully request that Council:

(a) *Maintain an Open Mind*: Ensure summarising and hearing submissions have 'enhanced independence' from Council.

(c) *Plain Language Summaries*: Provide accessible summaries of technical reports for community members without specialised expertise.

(e) *Procedural fairness*: implement principles that apply (by analogy) to private landowners involved in Public Works Act matters (accepting the absence of land acquisition here) and fund a group or groups of submitters to engage professional advisers, comparable to those advisers engaged for the Council, to enable effective and fair public participation.

(f) *Full Disclosure*: Confirm all reports and advice relied upon have been disclosed; and commit to disclosing any further information during the process with adequate opportunity to respond before decisions are made.

(g) *Resource Consenting submissions*: volunteer a public submission process, if submissions are not statutorily required, as part of PC7 (should it be approved) in relation to later resource consent applications for the Proposed Site.

These measures are consistent with Council's obligations to enable effective public participation, take account of community views, and act transparently and accountably when making decisions significantly affecting land use, property values and community character.

Amberley Beach Coastal Adaptation Plan

The CAP established a deliberate trigger-based adaptive planning framework designed to preserve community agency and avoid premature lock-in. We respectfully submit that PC7 undermines this framework, by committing substantial public resources and advancing a preferred pathway before the community has reached the decision point contemplated by the CAP.

The CAP explicitly establishes that "*when two triggers are reached, a formal decision on next steps will be made.*" This language is not merely procedural: it reflects the fundamental architecture of adaptive planning, which recognises that decisions about significant community change should be made when the need for

SUMMARY

Additional process safeguards are requested.

PC7 undermines the architecture of adaptive planning including in the CAP.

SUBMISSION

action becomes clear, not in anticipation of uncertain future conditions. The CAP's statement that *"care needs to be taken when implementing options now that might prevent an alternative option being adopted in future"* directly speaks to this concern. While PC7 proponents may characterise the rezoning as merely "enabling" rather than "implementing," this distinction breaks down when Council (on behalf of its ratepayers) has borrowed a significant amount to purchase the land and expended (or will expend) hundreds of thousands of dollars (estimated at circa. \$750,000) on PC7 up to the hearing stage (excluding appeals). If PC7 is approved, the Council would then spend millions of dollars on development, without certainty that Amberley Beach residents and others would commit to the "novel" scheme. If PC7 is appealed, even if successful, the Council may also spend millions in aggregate, before a start to development. These financial commitments create a powerful institutional momentum towards one pathway and precisely the type of lock-in that adaptive planning seeks to avoid.

Unless PC7 is abandoned shortly, Council will face significant pressure to proceed with a managed retreat regardless of whether triggers are met or whether the community ultimately supports this pathway. This creates a form of "sunk cost" lock-in that is antithetical to adaptive planning principles. The financial reality means that the hard protection option, identified in the CAP as feasible, is no longer genuinely available as an alternative. Council will face difficult questions about prudent use of ratepayer funds if it were to abandon PC7 only later.

Proponents of PC7 may emphasise that the rezoning *"does not force current residents to relocate"* and that *"property owners can choose whether to opt in."* This characterisation, while accurate on its face, obscures the ways in which PC7 contradicts the CAP's spirit and intent. The institutional momentum that PC7 creates will erode freedom of choice for residents and property owners at Amberley Beach and in the Hursley Terrace Environment in the future.

The success of PC7's model depends largely on Amberley Beach community uptake. The proposal contemplates developing additional market-rate sections to fund the overall development in a cost-neutral manner. If the Amberley Beach community does not opt in, as current opposition suggests will occur, then Council will be left with debt, land that is undeveloped and unwanted for its purpose, and an unresolved natural hazard problem. This risk was foreseeable and is precisely why the CAP established a trigger-based framework to ensure community support before committing resources, including in respect of a plan change.

The "voluntary" nature of PC7 does not address the fundamental inconsistency with the CAP's framework. The CAP did not merely contemplate that managed retreat would be voluntary for individual property owners; it contemplated that the community would collectively decide whether to pursue managed retreat as a pathway when triggers indicated the need for action. PC7 bypasses this collective decision-making process.

Council's financial commitments create pressure on the community that undermines genuine voluntariness. Once Council has borrowed money and spent substantial sums on PC7, there is institutional pressure for the scheme to succeed. This pressure may manifest in various ways, through rates policies, through

SUMMARY

Potentially problematic institutional momentum is created by PC7.

PC7 will result in an absence of freedom of choice for affected communities.

Council's financial commitments with PC7 create pressure on the community.

SUBMISSION

reduced investment in alternative hazard management approaches, or through the simple reality that Council has publicly committed to this pathway and will not invest in Amberley Beach infrastructure or otherwise regardless of community support for PC7.

Cost-neutral

The Economic Impact Assessment report describes “*cost neutral*” as selling sufficient “market lots” (and also including targeted rate revenue and other scheme income) so that income “closely approximates” the costs of land purchase and development, roading and infrastructure, legal fees and other expenses associated with the proactive relocation proposal.

Council has made cost neutrality legally significant and, as the section 32 report states, “*By providing for the relocation in a cost neutral manner, the relocation will not affect the economic well-being of the wider community (s5(2))*” of the RMA. It clearly forms part of the stated purpose of PC7 and is therefore relevant to the section 32 evaluation of whether the provisions are appropriate to achieve the objectives. It directly influences the spatial extent of the rezoning, which in turn affects compliance with the National Policy Statement for Highly Productive Land (NPS-HPL) requirement to rezone only the minimum necessary amount of highly productive land. It is also presented as an important benefit in the section 32 evaluation, demonstrating that the proposal does not impose significant costs on ratepayers. Cost neutrality also underpins this novel approach to natural hazard risk management, which may be relevant to giving effect to the NPS-NH.

There is no financial analysis connected with cleaning-up, decommissioning the infrastructure, the managing and re-purposing of the Amberley Beach township site post-relocation of residents. It not hard to envisage that these costs may be in the millions of dollars (increasing with time) resulting in significant future costs to the district that have been omitted from the limited economic assessment provided in PC7.

While cost neutrality is not itself a statutory requirement, it is integral to the legal justification for the extent and nature of PC7. If the cost neutrality objective were removed or significantly modified, the legal justification for the rezoning (particularly the rezoning of highly productive land) would be materially weakened.

The Economic Impact Assessment report does not reflect true after-tax costs and revenues, including any Income Tax implications (on profits) for Council acting as a developer. Taxation implications may be material to the “cost-neutral” analysis. Likewise, depreciation or capital allowances on infrastructure are not addressed.

The Economic Impact Assessment report supports an assessment that cost neutrality is achievable in a range of modelled scenarios, but it is explicitly contingent on assumptions about timing, sales prices and absorption,

SUMMARY

The Economic Assessment report scope contains significant express limitations, assumptions and contingencies and, as such, it unsuited to determine the cost-neutrality associated with PC7.

The report does not address a variety of foreseeable risks and liabilities.

SUBMISSION

development and inflation costs, and interest/finance conditions, with sensitivity analysis showing material variability in outcomes.

Aspects of the Economic Impact Assessment report appear to be erroneous or outdated and require further examination. For example, the report states at 3.2 that, *“consenting of the land is expected to occur in 2025 to 2026 and cost in the order of \$250,000, which includes internal officer time, expert support, and commissioner hearing costs.”* Consenting may not occur for some years; and Council’s estimate of costs until hearing is now \$750,000. Appeal(s) cost contingency is not factored into the Economic Impact Assessment report and, if appealed, may result in aggregate PC7 consenting costs running into the low millions of dollars. This would be some distance from the \$250,000 used for the economic modelling to date.

Foreseeable “cost neutral” risks and liabilities that should be assessed in the legal and planning materials include:

- (i) contractual obligations and remedies in owner agreements not yet finalised,
- (ii) scope change and infrastructure delivery risk,
- (iii) consenting delay and process risk beyond budget variance,
- (iv) participation and revenue collection variability,
- (v) constraints on balance-land divestment,
- (vi) acceleration costs if triggers occur early,
- (vii) risks of national and district political and governance change,
- (viii) reputational/representation risk if “cost neutral” is communicated as a firm commitment rather than an objective subject to uncertainty;
- (ix) taxation and potential taxation changes relevant to Council as land owner and developer, and to Amberley Beach residents;
- (x) legal costs associated with litigation and stapled-title enforcement on Amberley Beach residents;
- (xi) costings for landscape and mitigation planting and for decades of plant maintenance (expected to be a substantial initial and ongoing cost for Council),
- (xii) Amberley Beach house and vehicle ‘relocation risk’ (e.g. baches, houses, house buses and unused vehicles) adversely affecting the marketing and market value of the residential development;
- (xiii) material financial and Council-service impacts associated with former Amberley Beach residents attempting to obtain and obtaining code-compliance certifications for relocated homes and buildings;
- (xiv) unconventional residential land covenants to cater for Amberley Beach relocation components, such as permitting caravans and tiny homes.
- (xv) costs associated with public transport, walking or cycling links, existing roading upgrades, and amenities;
- (xvi) significant roading upgrades and changes to SH1 entrances from the site and from Hursley Terrace Road including land purchases; and
- (xvii) the risk that 121 lots for sale on the open market is not sufficient for cost-neutral, noting that the Council’s estimate of this number required increased by one-third (33%) between 2023 and PC7. In this context, the Economic Assessment Report models up to 250 lots.

SUMMARY

Certain components of the economic assessment appear outdated and incorrect.

The Economic Assessment report is absent certain potentially material components.

SUBMISSION

The Economic Impact Assessment report expressly states that its financial assessment is not a “*financial viability assessment*”; it “*should not be relied on in that regard*”; and, that its purpose is to inform “*the size of the development necessary*” from a funding and planning perspective, with a recommendation that further financial modelling be undertaken by a suitably qualified development expert if required. Subsequently, Council have confirmed in a public meeting on 20 July 2026 that Councillors will seek further detailed financial information; but the form of that information is not known and the public will not have an opportunity to submit on it.

We respectfully submit that the combination of omitted financial matters referred to above is unsatisfactory and the Economic Impact Assessment is inadequate for PC7.

Hursley Terrace Environment: Rural amenity and character

As noted elsewhere, examination of the impact of PC7 on the Hursley Terrace Environment is absent sufficient rigour. The existing rural character and amenity of the Hursley Terrace area (including the terrace top and the adjoining land beneath the terrace on the sea-side) is defined by its open pastoral landscapes, farming, plantings, and a small number of lifestyle properties that are designed and maintained for rural living.

The proposed plan represents a radical and adverse transformation of a rural environment from an attractive and productive area, with scattered dwellings, to incorporate a significant zone of dense residential subdivision, with a range of associated urban characteristics that would adversely affect its surrounds. Unlike a residential extension at the edge of an existing township, it is not possible to adequately integrate this proposed satellite development within its surrounding rural environment, nor can such a dense residential subdivision maintain or enhance amenity values and quality in a rural environment.

We respectfully submit that the PC7 reports commissioned for Council materially understate the affected areas that will suffer high or severe adverse effects on their rural character and scenic amenity. In reality, the “*high adverse effects on rural character and scenic amenity values currently experienced from 165 Hursley Terrace Road,*” will be experienced through traffic, noise and visual pollutants, both at 165 Hursley Terrace Road and widely around the Hursley Terrace Environment.

Landscape changes

Landscaping and mitigation planting are integral to PC7. From slope stability, recreation, landscape effect-softening, to visual mitigation for neighbours and positive environmental reasons. Without significant mitigation planting, adverse effects on visual amenity, rural character, and neighbouring properties would be severe over a wider footprint and for more than just the forecast initial 10 years.

SUMMARY

An express limitation contained in the report is material. No financial viability assessment of PC7 has been undertaken.

Consideration of the existing Hursley Terrace Environment and the proposed radical transformation of that environment appears to be largely absent or is materially understated by the evaluation.

Landscaping and mitigation planting plans are absent a range of ordinary safeguards.

SUBMISSION

The landscaping provisions in PC7 contain several material shortcomings that may compromise the effectiveness of the mitigation planting and they create uncertainty regarding long-term maintenance and costs. Specifically, the provisions lack:

- (i) clear mechanisms to address plant failure and replacement obligations;
- (ii) defined maintenance periods and performance standards;
- (iii) allocation of ongoing maintenance costs and responsibilities; and
- (iv) financial security to ensure implementation.

While the RMA provides statutory tools to address these issues through consent conditions and bonds, PC7's current framework does not adequately incorporate these mechanisms. Under PC7, there is significant risk that the intended landscape and visual mitigation will not be achieved or sustained.

The Landscape assessment concedes that, for some neighbours, the change from rural to residential will be a *"fundamental change to the landscape"* and that *"parts of the site will still be visible, including rooflines and two-storey dwellings"* even after mitigation planting is established.

The mitigation proposed (peripheral planting and setbacks) is largely generic and not specifically tailored to the unique viewing angles, distances, or the open field context for all affected neighbours. The site assessment appears to have erroneously missed areas with direct site visibility from the west and the north, where farmers and lifestyle properties will have affected direct viewpoints to the Proposed Site. No mitigation measures are proposed for these neighbours.

The landscape assessment relies on the eventual maturity of mitigation planting (at least 10 years) to reduce effects, but does not address the significant adverse effects that will occur in the interim period; nor does it propose any temporary mitigation measures for this period. Notably, the primary gully alongside the Proposed Site to the north is the primary mitigation planting site. Despite some prior feedback to Council, PC7 does not propose a near-immediate start date for mitigation planting, demonstrating the absence of priority to this measure and to the construction impacts on neighbours.

The section 32 assessment makes an attempt to improperly prioritise the effects on a narrow geographic footprint over the multi-dimensional effects assessment required. A concentration of continuing severe adverse effects within just some parts of the Hursley Terrace Environment does not make those effects acceptable under the RMA or otherwise.

Visual connection to the coastal environment and ocean

As PC7 states, including the RMM landscape report, the Proposed Site has certain key attributes, including *"views to the ocean"* and a *"visual connection to the coastal environment"*. This visual connection represents a defining environmental quality and character attribute of the Amberley Beach community that PC7 seeks to preserve through the relocation to this site.

SUMMARY

These plans do not mitigate during the lengthy construction and development phase over years or, at all, for some neighbours.

Minimisation of adverse effects through wider-community effect measurement is incorrect.

The site views and visual connection to the ocean and coastal environment are a defining feature of PC7.

SUBMISSION

This visual connection is legally significant to PC7. Council state that it would enable the relocated Amberley Beach community to provide for its social, cultural, and economic well-being through preservation of a defining characteristic of the existing settlement.

However, the preservation of this visual connection is not secure; and it is vulnerable to obstruction, interference or complete blockage, reducing or eliminating this defining characteristic that has heavily influenced the site location.

The site's continuing visual connection to the coastal environment is entirely dependant on a combination of landowners between the site and the ocean not planting or permitting the growth of trees (or other visual obstruction) within the line of sight. These landowners are a combination of private landowners, the Council and the Department of Conservation (DOC).

Trees (chiefly *Pinus Radiata*) planted for forestry, boundary plantings, and wilding trees form a significant part of the landscape within the area that represents the present visual connection to the coastal environment. *Pinus Radiata* forestry blocks are already a substantial feature of the area between the Proposed Site and the ocean and the planting of further forestry blocks is an option for landowners. Wilding *Pinus Ratiata* represent a largely unchecked problem in the relevant area and particularly on the Council and DOC properties where there appears to be no obvious eradication programme.

There are no land covenants or enforcement mechanisms on or proposed for the private landowners, Council or DOC that would enable the continued security of visual connection to the coastal environment; and there is a moderate to high risk of obstruction, interference or complete blockage visual connection to the ocean within 15 to 50 years that would undermine the preservation of this defining characteristic of the existing settlement on its new Proposed Site and PC7.

In addition, the Council reportedly faces considerable environmental and infrastructure pressure in respect of its existing waste-water treatment ponds within the area constituting the present visual connection to the coastal environment. The risk that the Council continues to expand their waste-water treatment operations in the area (including for regulatory compliance reasons) and, thus, undermine the attractiveness of this visual connection requires careful examination as part of PC7.

SUMMARY

Those views and that connection are at moderate to high risk of blockage or elimination.

Forestry and wilding trees present a material risk to the proposed visual connection.

There is a notable absence of Council and DOC wilding elimination activity.

The Council's waste-water plant presents a unattractive risk to the proposed visual connection.

SUBMISSION

Development and Construction period

PC7 represents a “novel” proposal of material scale and significance. Council has confirmed that public notification of later resource consent applications for the residential development by Council may not occur. Submissions would therefore not be possible at that point.

Noting the points above, the PC7 reports do not contain specific analysis of construction-phase impacts on the Hursley Terrace Environment, such as noise, dust, traffic, visual disruption, or the temporal sequencing of building activities.

The construction phase represents a significant period of physical activity that will have environmental and societal effects that are distinct from the completed dense residential development.

The PC7 reports acknowledge the time uncertainty and lot and infrastructure development, to house-build up to 230 lots. This phase may take more than a decade. These construction-related activities will severely impact neighbours, livestock and other flora and fauna in the Hursley Terrace Environment, including by way of adverse financial and mental health impacts for neighbours.

We respectfully submit that the section 32 evaluation is deficient because it fails to assess the environmental, economic, social, and cultural effects of the construction phase, which may extend over a decade and will have significant impacts on the Hursley Terrace Environment.

Reverse Sensitivity

The Plan Change site will give rise to ‘reverse sensitivity’ effects that have not been appropriately addressed.

Council has stated that, “*The planning process also considers the importance of protecting neighbouring rural activities. Matters relating to reverse sensitivity, rural operations and land-use compatibility will continue to be assessed as the project progresses.*” Future undefined assessment is unsatisfactory. The role of the section 32 report is to comprehensively consider these matters now.

The Proposed Site is currently rural. Unlike most areas subject to this form of rezoning the Proposed Site would be a satellite settlement, surrounded by farmland, zoned rural and used for primary production. Once 230 residential lots are established on the Proposed Site, the new residents become immediate neighbours to ongoing farming activities, including spraying, dust, noise from machinery, noise from working dogs and from livestock, night-time irrigation, odour (including odour-heavy silage feeding and strip-grazing cattle feeding), agricultural burn-offs, and other effects associated with primary production activities that surround the Proposed Site. All of these are entirely normal and lawful on rural-zoned land.

The reverse sensitivity risk is severe at the Proposed Site. It is the risk that new residents, unfamiliar with rural life or simply less tolerant of these effects than a working farmer would be, start complaining to the farmer directly, or via noise complaints, resource consent objections, or council enforcement requests. Over

SUMMARY

Evaluation of the development and construction phase(s) effects on the Hursley Terrace Environment has not occurred. These effects would be severe.

Public notification of later resource consents for development and construction activity may not occur or will not be wide-spread.

The impacts of Reverse Sensitivity on surrounding farm production, and on farmers and lifestyle block owners, has been materially understated in the evaluation.

SUBMISSION

time this can create practical, legal, financial and mental-health pressure on the farmer to change how they operate (e.g. spraying only at certain times, buffer zones, additional consent conditions, not using working dogs, moving and working with livestock only at certain times, etc.), effectively constraining productive rural activity that was there first, in order to protect the amenity of the new residential use. This is significant in the context of a plan change involving highly productive land, because it's one of the ways rezoning would erode agricultural productivity in the surrounding area without a single additional hectare of farmland being formally rezoned. The presence of housing next door changes what farmers can practically do.

We respectfully submit that 'reverse sensitivity' has not been appropriately addressed by PC7.

Traffic

Vehicle and people access to Hursley Terrace Road is a key feature of PC7. This road is currently classified as a Collector Road/Rural Connector. It features a narrow-formed width of 6.3m, has unsealed/grassed shoulders, and lacks edge line markings, pedestrian footpaths, or dedicated cycling facilities. The limited traffic volumes on Hursley Terrace Road today reflect a low-density rural character.

The Abley report states that, *"a secondary access intersection is proposed from Hursley Terrace Road. It is anticipated that this intersection will accommodate approx. 15% of the trips associated with the site to access Amberley to the north or travel southbound to the SH1 intersection."*

The Abley modelling or rationale for key assumptions relating to Hursley Terrace Road requires further close examination. This traffic report omits certain material estimations relating to proposed new vehicle and people movements; and it is absent any modelling or rationale for key assumptions in respect of its forecast usage of Hursley Terrace Road.

The second draft of the Abley report dated 26 March 2026 stated at 4.2 on page 15 that, *"75% of traffic will use the SH1 access with the remaining 25% being internal trips or using the Hursley Terrace Road access to connect to the wider network."*

However, in the final published report, this statement was changed to, *"75% of traffic will use the SH1 access with the remaining 25% being internal trips or using the Hursley Terrace Road access to connect to the wider network. It is anticipated that of the 25%, approximately 10% may be short internal trips and the remaining 15% would access Hursley Terrace Road to access destinations on the east of Amberley or may continue to the SH1 / Hursley Terrace Road intersection to turn left onto SH1."*

Why a significant 10% of all traffic movements would involve entry and exit of a vehicle without leaving the Proposed Site is unclear.

In terms of exit (and entry) from the proposed site, the approximate distance by proposed road from the centre of the residential development to the Hursley Terrace Road exit/entry is 400m. From the same starting point, the approximate distance to the SH1 exit/entry is 970m. Travelling from the Proposed Site via Hursley Terrace Road to the more frequent east-side services of Amberley township

SUMMARY

The Traffic assessment has materially understated or omitted the impact of PC7 and the resulting development on the surrounding small rural roads.

The traffic modelling and assumptions require further close examination. Risks of error appear significant.

Certain key traffic calculations appear incorrect or relevant data is omitted.

SUBMISSION

(including supermarket, chemist, liquor, fast-food, etc.) is an easy drive that avoids the SH1 speed, traffic and a requirement to cross SH1 twice. Distance, convenience, safety and economy will logically dictate significant use of Hursley Terrace Road from and to the Proposed Site.

It appears highly unlikely that only 15% of traffic would access Hursley Terrace Road. This figure appears materially understated and is not supported by adequate modelling or rationale.

Rural households in New Zealand generally own significantly more vehicles than urban households. The national average of cars per household is 1.9. Using an average 2.4 cars per household for a development in this rural area, given its proximity to vehicle recreation areas such as the beach and river-bed surrounds, the number of cars for 230 residential lots would be 552. In addition, given this ease of access to rural, river-bed and beach surrounds, a larger number of households than the national average are also likely to have motorbikes and cycles.

Using assumptions that are typical of a family-oriented rural subdivision:

- Cars/light vehicles: 2.4 per household × 230 = 552
- Motorbikes: 0.2 per household × 230 = 46
- Bicycles (including e-bikes): 2 per household × 230 = 460

In total, the different variety of motorised vehicles and cycles within the development that access both SH1 and Hursley Terrace Road would likely exceed 1,000.

In addition, there would be near-constant vehicle movements generated by social visitors and trade and service visitors to the site during working hours and, to a lesser extent, after-hours. These additional traffic movements have not been calculated but would be highly impactful, whether calculated as a distinct group or in aggregate with residents.

We note that the impact of years of construction and development of the Proposed Site (notably if a staged subdivision) with resulting high numbers of regular trade and service vehicles accessing the area from SH1 and Hursley Terrace Road have been omitted from the Traffic Assessment. It also seems likely that Hursley Terrace Road would be used in priority to SH1 for the first phase of the residential development, given the reduced entry and exit road works required compared to the SH1 exit and entry point.

Presently, fewer than 20 residents in 9 adjoining homes have direct access from a house to Hursley Terrace Road. PC7 would fundamentally alter this road characteristic by enabling up to 230 adjoining residential lots, increasing the total population with direct house access to Hursley Terrace Road to approximately 620 people (using the national average of 2.7 people per house), i.e. an approximately 3,000% increase in residents with direct road access and using in excess of 1000 motorised vehicles and cycles. The impacts of these immensely increased traffic volumes (cars, SUVs, trucks, cycling, electric scooters, motorbikes, plus roadside pedestrian walking) together with the consequential environmental contaminants, including noise and light, are materially under-estimated or in some cases omitted in PC7.

SUMMARY

Resulting new motorised vehicles and cycles may exceed 1000 in the Hursley Terrace Environment.

Evaluation of traffic impacts associated with a long development and construction phase has been omitted.

Direct home-to-Hursley Terrace Road access may increase by approx. 3,000% without plans to address consequential effects.

SUBMISSION

The Abley Assessment proposes a new access onto State Highway 1 with separate left and right turn lanes, but it has not assessed the cumulative impact on the existing Hursley Terrace intersection with SH1. If that intersection requires upgrading to accommodate the additional traffic, this could involve significant cost and may require land acquisition or designation.

Newcombes Road and Kowai River Road

PC7 omits assessment of the material adverse effects on Newcombes Road and Kowai River Road, each situated in close proximity below the Proposed Site and constituting faster beach and river-bed access routes from the Proposed Site than via Amberley Beach Road.

These narrow shingle roads, which provide direct beach access and serve existing residents are also likely to be materially adversely impacted by the proposed 230-lot residential development through:

- i. Increased traffic volumes on roads not designed for higher residential traffic, potentially affecting safety and efficiency contrary to District Plan Policy 4.1;
- ii. Adverse effects on amenity values of residents along these roads, including increased noise, traffic, and changes to rural character;
- iii. Potential impacts on the functionality and character of paper road beach access, raising issues under section 6(d) of the RMA regarding maintenance of public coastal access;
- iv. Erosion of rural character and sense of place that currently characterizes these roads and the surrounding area; and
- v. Road/beach parking, maintenance and upgrade costs that may not have been adequately assessed in the cost-benefit analysis.

We respectfully submit that the omission and inadequate treatment of these traffic related effects in the PC7 documentation for the three small rural roads referred to above, and for the intersecting Crosses Road, constitutes a material deficiency in the evaluation.

Infrastructure and Servicing

The Infrastructure and Servicing Assessment contains several material concerns including:

- i. insufficient certainty regarding sewerage infrastructure, particularly whether pumping will be required;
- ii. incomplete confirmation of water supply capacity and routing;
- iii. inadequate assessment of stormwater disposal constraints in relation to geotechnical hazards;
- iv. incomplete traffic impact assessment, particularly regarding the State Highway 1/Hursley Terrace intersection, Hursley Terrace Road, and Newcombes Road; and
- v. no confirmation that required regional consents for stormwater discharge and earthworks are obtainable.

SUMMARY

Beach and river-bed recreation access impacts via the faster/direct Newcombes Road and Kowai River Road routes have been omitted from the evaluation.

These shingled rural roads are unsuited to medium to high use.

The Infrastructure and Servicing assessment is incomplete for this dense satellite urban area with its greater risk than at an urban fringe.

SUBMISSION

We respectfully submit that the Infrastructure Assessment's reliance on future detailed design to resolve fundamental infrastructure issues creates significant uncertainty about development feasibility and cost-neutrality.

Section 32 Assessment

We respectfully submit that the section 32 assessment is inadequate. It fails to provide the level of detail and rigour required for a proposal of this scale and significance, does not adequately identify or assess reasonably practicable alternatives, and improperly characterises severe localised effects as low-moderate. PC7 is not the most appropriate way to achieve the purpose of the RMA.

Examples include:

Paragraph 55 of the section 32 report for PC7 provides an illustration of a flaw in that report when assessing the scale and significance of the anticipated PC7 effects as "low-moderate", based on the reasoning that "*the changes affect a single area, and will have a limited effect on the wider community*". This framing inverts the proper section 32 analysis. The report states that, "*The greatest impacts of the proposal are on the surrounding landowners, [i.e. Hursley Terrace Environment] with some lesser effects on the wider area arising from things such as changes to traffic patterns.*" However, section 32 of the RMA requires an assessment of environmental, economic, social, and cultural effects that is holistic and not strictly confined to geographic proximity, reflecting broader considerations of how policies or plans impact various social, economic, and cultural dimensions across potentially affected communities. The concentration of severe and continuing adverse effects within a specific geographic area does not render those effects acceptable or "low-moderate." For the directly affected community in the Hursley Terrace Environment, the effects are severe, long-lasting, and effectively irreversible, beginning with market uncertainty at notification, extending through years of construction activity, and culminating in the permanent presence of an intensive urban settlement where an exclusively rural and productive environment previously existed.

In the same vein as noted above, the Council have stated that, "*Should approval of The Plan Change be received, Councillors will then decide when the subdivision will happen. Approval of the plan change and/or subdivision does not create any obligation for existing Amberley Beach residents to relocate. Any future move will occur only if residents choose to do so and circumstances make relocation desirable. The Plan Change is intended to provide future options rather than require immediate action.*" This statement incorporates several material and uncertain components. For example, "*only if residents choose*" has no mechanism relating to a number; and when the Council would start to spend millions on construction is unsaid. Likewise, were the plan change to occur, with no development to follow for years or decades thereafter, the adverse market value impact of uncertainty for many already resident in the Hursley Terrace Environment would be material. While a development and construction phase would have a severe impact on the Hursley

SUMMARY

The section 32 assessment tries to improperly frame severe adverse effects as "low-moderate" based on a narrow geographic footprint.

The PC7 process and potential outcomes create uncertainty that will negatively impact Amberley Beach residents and those in the Hursley Terrace Environment.

SUBMISSION

Terrace Environment, the market uncertainty generated through prolonged inactivity would likely be financially destructive to a community reasonably expecting to operate property sales and purchases over time in ordinary market conditions.

The provisions in PC7 are not the most appropriate way to achieve the objectives of the proposal. Section 32(1)(b)(i) of the RMA requires the Council to identify “*other reasonably practicable options for achieving the objectives*” of the proposal. A staged or combined pathway, consistent with the Council's own adopted Coastal Adaptation Plan methodology, is, for example, a reasonably practicable option that has not been identified or evaluated.

The effectiveness and efficiency assessment is predicated on an incorrect understanding of demand from existing residents of Amberley Beach. In the absence of actual demand (as recent anecdotal information strongly suggests), the assessment of costs and benefits required under section 32(2) is flawed. This flaw also affects the analysis of the risk of acting or not acting, if there is uncertain or insufficient information about the subject matter of the provisions, as required by section 32(2)(c).

National Policy Statement for Highly Productive Land 2022 (Amended December 2025)

We respectfully submit that PC7 is contrary to the National Policy Statement for Highly Productive Land (**NPS-HPL**).

The plan change site is predominantly classified as LUC 2 (with a small portion being LUC 3).

The overall objective of the NPS-HPL is that highly productive land (**HPL**) is protected for use in land based primary production. Policy 5 explicitly directs that the use of HPL is avoided, except where otherwise provided for within the NPS-HPL.

Council's duty here is to ensure there is a robust consideration of costs, benefits and trade-offs when urban rezoning is proposed on HPL. That has not occurred. Instead, Council has discounted other options without a robust consideration, based on the HPL classification on the urban edge of Amberley township, as well as its self-imposed requirement to keep the Amberley Beach community together (considered highly unlikely) and with a visual connection to the coastal environment (which is unsecured and subject to high risk of visual blockage or visual elimination).

The central issue is whether the Council has satisfied the three conjunctive requirements in clause 3.6(4) that would permit urban rezoning of HPL, and whether the spatial extent of the rezoning meets the additional requirement in clause 3.6(5).

The exemption pathway is set out in clause 3.6(4). However, the criteria in that clause are not satisfied by the PC7. In particular:

SUMMARY

In the absence of actual demand, the assessment of costs and benefits is flawed.

Rigorous consideration of costs, benefits and trade-offs in this urban rezoning proposed on HPL has not occurred.

The three conjunctive requirements in clause 3.6(4) that would permit urban rezoning of HPL are not satisfied.

SUBMISSION

SUMMARY

A. NPS-HPL: Clause 3.6(4)(a): Urban Zoning Not Required to Meet Expected Demand

- i. Council has not demonstrated that urban zoning is “*required*” to provide sufficient development capacity to meet expected demand for housing. The assessment of whether urban rezoning is “*required*” to provide sufficient development capacity involves examining whether there is already adequate feasible plan-enabled development capacity to meet demand.
- ii. The word “*required*” in clause 3.6(4)(a) imposes a high threshold. The rezoning must be necessary to provide sufficient development capacity, not merely desirable or convenient. Where, as here, the demand is predicated on residents choosing to relocate from an existing settlement, rather than on population growth or housing shortage, the rezoning cannot be said to be “*required*” to meet expected demand.
- iii. The voluntary nature of any potential move by Amberley Beach residents also undermines the strict “*required*” threshold. There is no “relocating community” until enough commit to relocation such that “community” is re-creation will be achieved. Even with reasonable numbers, it is not possible, as outlined in paragraph (B. vii). below.
- iv. The demand assessment underlying PC7 is fundamentally flawed because it relies on the assumption that existing residents of Amberley Beach wish to relocate to the Proposed Site. That is an erroneous assumption; and recent information suggests that a significant majority have signalled that they do not wish to relocate.
- v. The Economic Impact Assessment states that the rezoning is required not to provide additional capacity for a growing population, but instead to provide equivalent capacity for the relocating community (109 parcels). This assumption is erroneous because it does not reflect actual expected demand for housing in the district, but rather a speculative relocation scenario.
- vi. The concept of “*expected demand*” in clause 3.6(4)(a) must be interpreted in the context of genuine housing need in the district, not a Council-initiated relocation scheme.
- vii. The additional 121 market lots included in PC7 (i.e. the majority of lots at the Proposed Site) are expressly intended to fund the relocation and make it financially viable, not to meet housing demand. The Economic Impact Assessment acknowledges that these lots are “*required in order to fund the relocation*” and “*make the proactive relocation financially viable*”. This confirms that the rezoning is driven by financial considerations related to the

SUBMISSION

relocation scheme, not by expected demand for housing in the district.

SUMMARY

B. Clause 3.6(4)(b): Other Reasonably Practicable and Feasible Options Exist

There are other reasonably practicable and feasible options for providing the required development capacity (such that it exists).

The Section 32 report and Economic Impact Assessment assert that there are no alternative options because the development capacity required relates to provision of a new distinct settlement area that must keep the Amberley Beach community together, be located close to the existing settlement and coast, be outside natural hazard areas, and be of sufficient size to ensure financial neutrality. However, these criteria are self-imposed constraints that artificially narrow the range of alternatives.

- i. The requirement that the Proposed Site keep the Amberley Beach community together as a distinct settlement is a policy choice by Council, not a requirement imposed by the NPS-HPL or any other statutory instrument. Clause 3.6(4)(b) requires an assessment of whether there are other reasonably practicable and feasible options for providing the required development capacity, not whether there are other options that satisfy the Council's preferred relocation model.
- ii. Even accepting Council's criteria, the Economic Impact Assessment acknowledges that all other locations within that area (i.e. between Amberley Beach and Amberley Town) are also located on highly productive land. This suggests that alternative sites exist, albeit also on HPL. The fact that alternatives are also on HPL does not mean they are not "reasonably practicable and feasible options" within the meaning of clause 3.6(4)(b). The Economic Impact Assessment notes that a large proportion is LUC 1 (to the north of the Proposed Site), making those sites potentially less suitable than the PC7 site, which is predominantly LUC 2. In this case, given the LUC 1 land is on the boundary of the Amberley township, the argument is flawed; the NPS-HPL does not establish a hierarchy of sacrifice between land classifications. The facts suggest that the PC7 site was selected not because it is the only option.
- iii. The assessment of alternatives appears to have been limited to sites that would accommodate the entire relocation scheme (109 parcels plus 121 market lots). However, if the 121 market lots are not genuinely required to meet "expected demand" (as discussed above), then the required development capacity is significantly smaller, and a wider range of alternative sites may be reasonably practicable and feasible.

Rosewood PC7 submissions: George Forbes and Laura Palomino Forbes as trustees, the registered proprietors of 205 Hursley Terrace Road, Amberley.

SUBMISSION

- iv. No consideration appears to have been given to non-HPL sites, either within the Hurunui District or in adjacent areas. While the Economic Impact Assessment states that the relocation site must be "*on the coastal side of Amberley in a place with easy access to Amberley Beach*", this is again a self-imposed constraint that unduly limits the range of alternatives.
- v. The section 32 report states that maintaining a separate community and therefore the sense of identity for Amberley Beach requires a site that is separated from Amberley itself. However, there is a risk that Council have inaccurately conflated feedback indicating preferred proximity to the Amberley Beach and information reportedly received about residents "*not wanting to be part of the Amberley township*".
- vi. The driving time between the Proposed Site and the southern / eastern boundaries of the Amberley Town is only approximately 4 minutes. The minimal driving time between the two locations reduces the legitimacy of the Proposed Site on the basis advanced by Council.
- vii. Even if all 109 lots from Amberley Beach relocated (which is highly unlikely) the majority of lots on the Proposed Site (circa 121) would be for non-Amberley Beach residents. Given the proportionality of residents, whether fully utilised, or, only with a de minimis take-up by Amberley Beach residents (as anticipated), the continuing character and identity requirements of the community on the Proposed Site described in PC7 cannot be satisfied.
- viii. The urban residential development of Amberley Town has been significant in the last 20 years. That development has generally occurred in a tradition manner, where the existing town boundaries are expanded over time into immediately adjoining land. The land surrounding the Amberley township is not protected reserve land or land of a higher protection classification than LUC1. Further urban development in this area, some of which is situated only some 4 minutes' drive from the Proposed Site, is occurring and appears likely to continue in the future.
- ix. Planning policy dictates that "*well-planned outward growth on the urban edge on HPL will generally be preferred over sporadic urban development on non-HPL away from urban centres with less cohesion, accessibility, diversity and so on.*" This illustrates the fact that HPL classifications at the edge of the Amberley township are of a lesser consideration for 3.6(4)(b) than considerations concerning a new remote settlement.

Respectfully, the Council has not demonstrated that there are no other reasonably practicable and feasible options for providing the required development capacity, and clause 3.6(4)(b) is not satisfied.

SUMMARY

SUBMISSION

SUMMARY

C. Clause 3.6(4)(c): Benefits Do Not Outweigh Costs

The environmental, social, cultural and economic benefits of rezoning do not outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.

- i. The benefits identified are primarily short-term economic benefits related to avoiding hazard protection costs and construction activity. However, clause 3.6(4)(c) requires consideration of *"long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production"*. The assessment does not adequately address the long-term and potentially irreversible loss of 22-27 hectares of LUC 2 land, which is among New Zealand's most productive agricultural land.
- ii. The objective of the NPS-HPL is to protect highly productive land *"for use in land-based primary production, both now and for future generations"*. This reflects a policy judgment that the long-term value of retaining HPL for food production outweighs short-term development benefits in most circumstances. The assessment does not engage with this fundamental policy objective or explain why the benefits of this particular rezoning are sufficient to outweigh the long-term costs.
- iii. The assessment does not adequately consider intangible values associated with the loss of HPL. Clause 3.6(4)(c) expressly requires consideration of *"both tangible and intangible values"*. Intangible values may include the intrinsic value of productive land, the cultural significance of land-based primary production, and the importance of food security for future generations. The Economic Impact Assessment focuses primarily on quantifiable economic benefits and costs, with limited consideration of these broader intangible values.
- iv. The Section 32 report states that the benefits identified above are considered to far exceed the foregone agricultural production capacity of the plan change site. However, this conclusion appears to be based on a narrow comparison of the economic value of avoided hazard costs versus foregone agricultural production, without proper consideration of the long-term and intangible costs required by clause 3.6(4)(c). Public information suggests that the stated agricultural production capacity of the site may have been understated in the section 32 report relative to the advertised capacity at the time of the 2025 land sale to Council and previously.
- v. The benefits assessment is undermined by the fact that the rezoning is not genuinely required to meet expected demand for housing (as discussed above). If the rezoning is not necessary to address a genuine housing need, then the benefits are correspondingly reduced, and the balance tips further against rezoning.

The Mayor and Councillors
The Chief Executive Officer
 Hurunui District Council
 66 Carters Road
 Amberley
 North Canterbury

8 June 2026

OPEN CORRESPONDENCE

Dear Mayor, Councillors, CEO,

ROSEWOOD: LAND USE CHANGE AND RESIDENTIAL DEVELOPMENT

Following consideration of the initial public consultation and plans issued by Council, the signatories to this letter write to convey their view in relation to this proposed land use change and residential development.

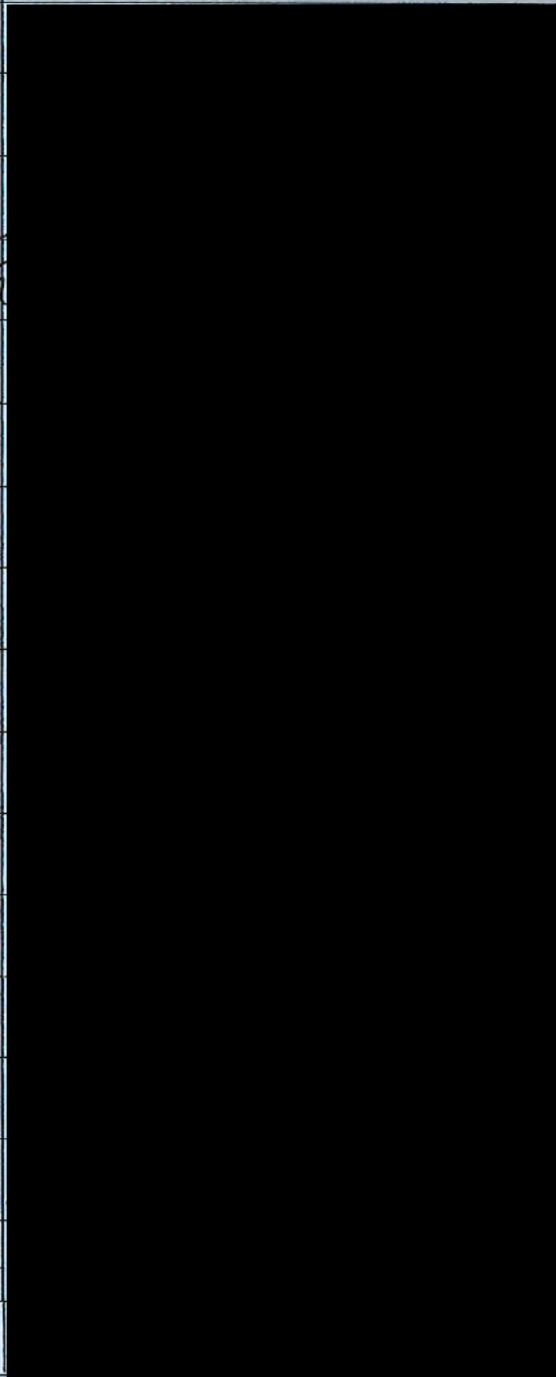
The signatories to this letter OPPOSE the proposed land use change and residential development at the Council owned property known as Rosewood.

- This letter provides early certainty for decision-makers at Council in respect of community approval or opposition.
- The signatories to this letter represent the ratepayers and property owners located proximate to the proposed Rosewood site. It does not seek to communicate by way of a large volume of signatories.
- This letter does not seek to outline reasons for the view conveyed. It is understood that this opportunity will arise at later moments, if the proposal proceeds.
- The absence of any signatory does not suggest a contrary view.

Yours faithfully,

List of signatories at Appendix 1

Appendix 1

Name	Address
Rose Hinton Att	
Michael T. Att	
Cot Campbell Munro	
Johnny Nevin	
Nikki Nevin Att	
Mitch Cochrane Att	
Laura Fairbrass Att	
Vicki Sanford Att	
Dave Sanford Att	
Debbie Ducker Att	
Shaun Ducker	
Hilary + Bill Turnbull Att	
Grawt Chapman	
Tracey Chapman	
Wayne Chisnell Att	
Jenny Chisnell Att	
Coles Gomeach	

Appendix 2

Map of signatory properties



SUBMISSION

SUMMARY

Minister's Directive to Council

In June 2026 the Minister for Climate Change and for Local Government sent all Councils a written directive stating, inter alia, that the New Zealand Government expects Councils to:

Use a range of credible climate scenarios when assessing infrastructure and planning decisions, including medium and high-end scenarios.

Clearly identify which scenario has been adopted as the primary planning assumption and explain why.

Demonstrate the additional costs associated with higher-end climate assumptions and disclose the impact on rates, debt, and long-term affordability.

Prioritise adaptive pathways and staged investment approaches wherever practical, rather than defaulting to immediate construction of infrastructure designed solely around worst-case assumptions.

We understand that sea and climate change metrics originally used for Council in writing the CAP were not peer reviewed independently of Council and that some have now been superseded by other authoritative metrics or directives. We respectfully submit that PC7 and the basis for PC7 does not comply with this ministerial directive; and that the directive illustrates that the section 32 evaluation did not adequately assess the risk of acting under uncertain information.

The June 2026 Ministerial directive to Council is not being followed.

Original climate change metrics used as the basis for PC7 have been subject to later examination and change but are not considered in PC7.

National Policy Statement for Urban Development 2020

The Amberley community is predicted to surge to 10,900 residents within 30 years according to reporting from Council.

The National Policy Statement for Urban Development 2020 (**NPS-UD**) promotes "well-functioning urban environments" that enable social, economic, and cultural wellbeing. The Proposed Site is rural and is not contiguous with an urban area. PC7 is contrary to the principles and objectives of the NPS-UD including, in particular:

- i. Objectives 1 and 3.
- ii. Policies 1, 5, 6, and 8.

PC7 states that NPS-UD does not apply, but, "*Notwithstanding this, the general premise of the proposed rezoning aligns with outcomes sought in the NPS-UD, in terms of providing sufficient land for housing, and providing for a change to an urban area which responds to an identified community need and which will improve resilience to climate change.*" PC7 attempts to cherry-pick elements of the NPS-

While stating that the NPS-UD does not apply, forecast Amberley population growth means essential principles and objectives within NPS-UD

SUBMISSION

UD while ignoring associated essential principles and objectives of the policy statement.

A new residential area that is remote from Amberley, with no public transport, walking or cycling links, or amenities, raises concerns about accessibility and integration with transport and services. The lack of public and active transport options, and the absence of amenities, means PC7 does not provide for the broader diversity of needs expected in a well-functioning urban environment. Sound resource management practice is unlikely commend any near-vision approach that is contrary to the principles and objectives of the NPS-UD.

We respectfully submit that, as a remote settlement, NPS-UD minimum requirements should, at the least, inform PC7.

Hurunui District Plan

We respectfully submit that PC7 is inconsistent with and fails to implement the objective and policies in the Hurunui District Plan, including Chapter 3:

- i. Objectives 3.1, 3.2.
- ii. Policies 3.1, 3.2, 3.5, 3.6, 3.8.

The proposal represents an expansion of urban settlement into rural land, having adverse effects on the district's high standard of rural amenity and high-quality soil resources.

PC7 is inconsistent with and fails because it proposes to rezone 34 hectares of rural land to Residential 1 in a manner that fundamentally conflicts with Objective 3.1's requirement to maintain rural character and amenity values, including spaciousness, scattered buildings, predominance of vegetation, and rural outlook.

The rezoning will facilitate urban residential subdivision with internal roads, footpaths, and reticulated services that are antithetical to rural character. While PC7 may serve some natural hazard mitigation objectives, it does not adequately reconcile this purpose with Chapter 3's rural protection framework, and the section 32 report does not contain sufficient analysis of consistency with Chapter 3 objectives and policies.

PC7 is also inconsistent with the objectives and policies in other Chapters, including:

- i. Chapter 4.
- ii. Chapter 5.
- iii. Chapter 8.
- iv. Chapter 9.

Chapter 4 (Settlements) seeks adaptive, vibrant and healthy settlements that retain their own character, environmental quality and sense of community, yet PC7 proposes a new separated residential settlement on rural land that does not consolidate with existing urban areas and fundamentally changes the environmental quality of the rural site.

SUMMARY

should not be ignored for PC7.

PC7 is fundamentally inconsistent with and fails to implement essential parts of the District Plan.

SUBMISSION

Chapter 5 (Land-use and Infrastructure) seeks consolidated, well-designed and sustainable growth in and around existing urban areas as the primary focus for accommodating growth, and sustainable development patterns that ensure urban growth occurs in a form that concentrates or is attached to existing urban areas, whereas PC7 proposes a 34-hectare residential rezoning that is spatially separated from the existing Amberley urban area.

Chapter 8 (Transportation) seeks a safe and efficient transport network, but the proposal will generate significant additional traffic and change traffic patterns in a location that is not integrated with existing settlement infrastructure and, in the case of roads other than SH1, are built and maintained only for rural-grade low use. Residents of the new settlement will be entirely dependent on private vehicle access, with no provision for public transport, pedestrian connectivity, or active transport options to access daily necessities. This car-dependent development pattern contradicts the objective of serving "all users" of the transport network and places disproportionate reliance on private vehicles, thereby limiting accessibility for non-drivers, increasing vehicle movements, and creating inefficiencies in the transport network.

Chapter 9 (Indigenous Biodiversity) seeks to halt the decline of indigenous biodiversity and safeguard life-supporting capacity, yet PC7 proposes urban development that will permanently convert rural land and may adversely impact existing or potential indigenous vegetation and habitats through the introduction of intensive residential land use and associated infrastructure.

Canterbury Regional Policy Statement

We respectfully submit that PC7 fails to give effect to the Canterbury Regional Policy Statement (CRPS), including in the following chapters:

Chapter 5 of the CRPS addresses land use and infrastructure, seeking development that is integrated, sustainable, and which consolidates growth in and around existing urban areas in a coordinated and efficient manner that minimises adverse effects on rural character, productive land, and natural resources. PC7 proposes a dense residential rezoning on rural land that represents expansion beyond the existing Amberley urban area rather than consolidation within it, potentially compromising the efficient use of infrastructure and the maintenance of rural character.

Chapter 15 of the CRPS addresses soils. PC7 is inconsistent with chapter 15 because it would permanently remove highly productive LUC 2 land from primary production and commit it to dense urban residential use. Chapter 15 recognises the finite nature and productive value of Canterbury's soil resources and seeks to safeguard highly productive soils for productive use. The proposed rezoning therefore represents a significant and effectively irreversible loss of productive land which has not been adequately justified.

SUMMARY

PC7 fails to give effect to different parts of the Canterbury Regional Policy Statement, including chapters relating to land use and soils.

SUBMISSION

The New Zealand Coastal Policy Statement (NZCPS)

Regional and district plans must "give effect to" the NZCPS. The District Plan records that the coast is one of the district's most significant natural resources and that the coastal environment can generally be regarded as the areas in which the coast is a significant part or element. The "*coastal environment*" is defined by local characteristics and coastal processes and should be approached in light of Policy 1 of the NZCPS. The District Plan's mapped coastal environment is a relevant indicator but is not determinative of the statutory "*coastal environment*" for RMA purposes.

In this case, the District Plan's mapped coastal environment area is proximate to the Proposed Site and as outlined in PC7 the current and proposed connections between the two areas are integral to PC7.

The NZCPS includes Policy 3 on the precautionary approach which provides: adopt a precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse.

The dense residential development envisaged at the Proposed Site represents a substantial intensification of residential activity in the coastal margin. This scale of development has the potential for cumulative effects on the coastal environment, including increased demand for coastal access, potential effects on coastal water quality from stormwater and wastewater management, and increased pressure on coastal amenity values.

Council's section 32 report does not assess consistency with the NZCPS, despite assessing consistency with other national policy statements. PC7 relies on the fact the Proposed Site is outside the District Plan's mapped coastal environment. We respectfully submit that this applicability assessment by Council is incorrect and results in the significant omission of this national policy statement in the section 32 report.

Purpose of the RMA

We respectfully submit that PC7 is contrary to the purpose and principles of the RMA, including in particular Part 2.

PC7 appears not to align with the purpose and principles outlined in Part 2 of the RMA, particularly the environmental bottom lines in section 5(2) and the section 7 matters necessitating particular regard.

PC7 is fundamentally inconsistent with the purpose and principles of the RMA. The proposal fails to promote sustainable management as required by section 5, as it converts 34 hectares of rural land to dense residential use in a location physically separated from the existing Amberley township, representing inefficient urban sprawl rather than sustainable development. This location is contrary to the Canterbury Regional Policy Statement's clear direction (Objective 5.2.1 and Policy

SUMMARY

The "coastal environment" is not defined by District Plan mapping and PC7 fails to consider or give effect to the New Zealand Coastal Policy Statement, including that statement's precautionary approach principle.

PC7 does not align with the purpose and principles outlined in Part 2 of the RMA.

Dense residential satellite development in a location physically separated from the existing Amberley

SUBMISSION

5.3.1) that growth should be concentrated in and around existing urban areas as the primary focus. The rezoning does not represent efficient use and development of natural and physical resources (section 7(b) RMA), as it will require extension of infrastructure to a new location and generate additional transport demands, when more efficient alternatives closer to existing urban areas may be available.

While PC7 addresses section 6(h), which highlights the management of significant risks from natural hazards, this does not overrule the obligation to account for section 7 matters, such as the maintenance and enhancement of amenity values and environmental quality. Section 7 specifically requires attention to amenity aspects like spaciousness, rural outlook, and vegetation, all of which appear significantly impacted under PC7. A decline in environmental quality and rural amenity values suggests a deficiency in balancing the environmental and development considerations required by the RMA.

Additionally, a rezoning of this scale, entailing a permanent transition from rural to urban designation, risks not meeting section 5(2)(c), which mandates the avoidance, remedying, or mitigation of adverse effects on the environment. The irreversible loss of rural character and potential for primary production, as a result of rezoning the 34 hectares to Residential 1, suggests that mitigation or remedying of these effects may not be feasible.

The absence of sufficient amendments to the District Plan's objective framework, despite such significant changes in land use, may indicate that PC7 disregards the integration of the RMA's purpose and principles. This could heighten potential internal inconsistencies and further underscores the lack of alignment with the statutory framework.

Conditions requiring public notification: Section 77D(a) RMA

Noting Council's public advice on 20 July 2026 that there will be no need to publicly notify later resource consent applications, in the context of the "novel" character of PC7 and the combination of the material adverse impacts referred to in this submission and other submissions in opposition, the preliminary nature of certain PC7 assessment reports, and the short 30 working-day submission period selected by Council for PC7, if PC7 is approved in any form, this submission seeks the imposition of conditions under s 77D(a) of the RMA in any plan change under PC7, requiring public notification and public submissions for later resource consent applications and any other significant steps.

Section 77D RMA expressly empowers local authorities (commissioners in this case) to include rules in a plan specifying activities for which consent applications must be publicly notified.

Public notification serves a critical role in promoting transparency and public participation in decisions with potential environmental impacts. The ability to specify mandatory public notification aligns with the broader framework of ensuring procedural fairness and environmental management under the RMA. The importance of public input in resource management decisions has been recognised in legislation and in case law.

SUMMARY

township, represents inefficient urban sprawl rather than sustainable development.

A decline in environmental quality and rural amenity values represents a deficiency in balancing environmental and development considerations.

Limiting public participation in a development of this "novel" character is inappropriate. Further mandatory public notifications are required if PC7 progresses.

Rosewood PC7 submissions: George Forbes and Laura Palomino Forbes as trustees, the registered proprietors of 205 Hursley Terrace Road, Amberley.

SUBMISSION

This submission requests a specific rule in PC7, if it is approved in any form, mandating public notification and allowing for public submissions, for activities associated with PC7 that are likely to have more than minor environmental impacts.

CONCLUDING COMMENTS

The origins of PC7 appear to lie in a genuine and well-intentioned desire to provide a local government response to potential climate change impacts at Amberley Beach and then other coastal communities. However, as the process has progressed, institutional momentum and a natural desire to defend work already undertaken risks obscuring certain facts. As with this submission, initial public responses to the process illustrate that those facts increasingly challenge some of the assumptions on which PC7 is being advanced. The issue now is not whether the original intent was sound, but whether the evidence continues to support the proposed outcome. We respectfully submit that it does not.

We request that PC7 be declined in its entirety. Alternatively, if PC7 is approved in any form, we request conditions under section 77D(a) RMA requiring mandatory public notification and public submissions for subsequent resource consent applications associated with the development.

SUMMARY

Good intent has succumbed to momentum that puts facts at risk.

Decline PC7. If approved, then with mandatory public notifications and submissions.

Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

- *Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.*

- **To:** Hurunui District Council

- **Name of submitter:***field type single line

Jackson Aitken

- This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

- **Trade Competition:***field type drop-down

Could you gain an advantage in trade competition in making this submission?

- ***field type drop-down**

Are you directly affected by an effect of the subject matter of the submission that:

1. Adversely affects the environment; and
2. Does not relate to trade competition or the effects of trade competition.

- **The specific provisions of the proposal that my submission relates to are:**field type richtext

Please provide the rule number.

This submission relates to the whole of Plan Change 7 – Rosewood Terrace, including:

1. the proposed rezoning of part of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone;
2. the proposed Outline Development Zone overlay;
3. the Outline Development Plan for the Rosewood Terrace development;
4. the proposed development capacity of approximately 230 residential lots;
5. the stated purpose of the plan change, being to enable the proactive relocation of the Amberley Beach settlement;
6. all provisions, policies, rules, explanatory material and implementation mechanisms associated with the proposed rezoning;
7. any proposed or implied relocation pathway for Amberley Beach residents;
8. any cost, infrastructure, servicing, staging, allocation, development contribution, rating, or affordability consequences arising from the proposal; and
9. any Council decision, implementation document, agreement, policy, or future framework that may affect Amberley Beach residents and the continuation of the existing Amberley Beach community.

- **My submission is:**field type richtext

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views.

You can upload supporting documents below.

I oppose the proposed Plan Change 7 and the current approach to the Amberley Beach Coastal Adaptation Plan.

I understand that Amberley Beach has coastal risks and that Council needs to plan ahead, and I appreciate that. My concern is that Council seems to be pushing ahead with a major subdivision and relocation plan before it has been properly demonstrated that the relevant triggers have actually been reached.

The Coastal Adaptation Plan is supposed to be an adaptive process based on agreed triggers. I would like Council to clearly show **which triggers have actually been reached, when they were reached, and what evidence supports moving ahead now.**

I am also concerned about the statement that the development will be **“cost neutral to the wider community.”**

The wider community might be cost neutral, but existing homeowners could face significant financial losses through this process. From my position, it is simply not financially viable to trade my existing house and section for an \$11,000 section much further away from the beach and town.

- **I seek the following decision from the consent authority:**field type richtext

Please be precise about what exactly you are seeking.

I want Council to clearly explain:

What does “cost neutral to the wider community” actually mean?
 Who is responsible if the development costs more than expected?
 Have the financial losses and costs to existing Amberley Beach homeowners been properly assessed?
 Why is this major subdivision being progressed now if the adaptation process is meant to be trigger-based?
 Before rezoning is confirmed, I believe Council should clearly identify:

What the relocation triggers are and whether they have been reached;
 The evidence supporting the need to relocate now;
 How the consultation process will work;
 Whether relocation is genuinely voluntary;
 Who will pay for the relocation and associated costs;
 How existing residents will be protected from being financially disadvantaged;
 How the new lots will be allocated;
 Whether existing Amberley Beach residents will receive priority; and
 How affordability will be addressed.
 I don't believe it is fair to describe the overall proposal as cost neutral if a significant financial burden is effectively being placed on individual homeowners.

I also question whether approximately 230 new sections are justified at this stage, and whether other options have been properly considered before committing to such a large development.

I'm not against planning for the future of Amberley Beach. I am against what appears to be a rushed approach that could leave existing homeowners financially worse off without clear evidence that the time has come to take this step.

I ask Council to slow the process down, clearly demonstrate that the relevant triggers have been reached, properly assess the financial impact on existing homeowners, and clearly identify who is carrying the financial risk of the proposed development.

For these reasons, I oppose Plan Change 7 in its current form

- **Upload any supporting documents here:**field type file upload
- **Do you wish to be heard in support of your submission?***field type drop-down
 ▾
- **If others make a similar submission, I will consider presenting a joint case with them at the hearing:**field type drop-down
 ▾

Contact details for submitter

section

- **Address:***field type address

Street Address 30 Grierson Avenue

Address Line 2

City Amberley

State / Province / Region Canterbury

Postal / Zip Code 7481

Country New Zealand

- **Phone number:**field type number

- **Email:***field type email

- **Contact person:**field type multi line

Name and designation if applicable

- **Note to submitter:**

The closing date for serving submissions on the consent authority is the 20th working day after the date which notification is given **(5pm Friday 21 August 2026)**.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

- **Privacy information:**

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

From: Louise Webb <Louiselkw@outlook.com>
Sent: Tuesday, 18 August 2026 5:33 pm
To: Planning <planning@hurunui.govt.nz>
Subject: Plan Change &- Rosewood terrace

You don't often get email from louiselkw@outlook.com. [Learn why this is important](#)

I have made a submission.

1. I would like a confirmation email to acknowledge receipt. The online screen acknowledging response has no specific number attached to my submission / or reference- effectively HDC is expecting expect people "to trust " the system
2. On the submissions , one is asked to state the "rule" number- without providing any link or guidance as to what that means or how to find it.
How difficult does HDC want to make it for constituents? It is unreasonable to expect , should you be wanting broad community engagement - to understand, a drop down list of various headlines would have been helpful

In any event- the only reference that I found after wading through the economic assessment was this - please attach it to my submission

4.1 NPS-HPL requirements

The NPS-UD does not list Hurunui District Council as a Tier 1 or Tier 2 local authority, and the relevant NPS-HPL clause for the PC application is clause 3.6(4):

(4) Territorial authorities that are not Tier 1 or 2 may allow urban rezoning of high-value land only if:

(a) the urban zoning is required to provide sufficient development capacity to meet demand for housing or business land in the district; and

(b) there are no other reasonably practicable and feasible options for providing the development capacity; and

(c) the environmental, social, cultural and economic benefits of rezoning outweigh environmental, social, cultural and economic costs associated with the loss of high-value land for land-based primary production, taking into account both tangible and intangible factors.

A further requirement is in clause 3.6(5):

Please respond to this email. Noting you have my submission and the attached reference for comment

Thank you
Lulu Webb

Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

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To: Hurunui District Council

Name of submitter: *

Louise (Lulu) Webb

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

I am **opposed** to the Plan change request to the Hurunui District Plan to rezone part of the property 185 Ashworth's Road, Amberley from Rural Zone to Residential 1 Zone , as stated to provide for the future proactive relocation of the 109 Amberley Beach residents within a larger property development of 230 residential lots

I am opposed to any outcome that amends existing provisions in the Hurunui for the protection of High Productive Land .

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

I am opposed to a Plan Change request , which if approved , would advance a Council Lead Property Development- being a 230-lot housing development . A housing development in Ashworth's Road has never been in the Long-Term Plan . Land to the East of Amberley identified for future housing growth . Without the basis stated for pro-active re-location the Housing development plan would never have met existing Council Policy on HPL.

This proposed Plan change request to change the status of HPL - has at its core the rationale based on Climate Change and pro-active re-location , of which there is no national precedent.

The VERY basis on which the LGFA development funding was secured (the Climate Adaption Plan) was to provide Amberley Beach residents with an agreed pathway to eventual re-location once certain triggers were reached. The Council purchase of the land in 2025 was " sold" to the wider community as intended to be "kept in reserve" as land banking – so that as triggers within the CAP happened in due course planning would be agreed with the wider community and the Amberley Beach residents.

The Minister for Local government has written to mayors outlining concerns about the use of extreme climate forecasting scenarios, RSCP8.5 and RSCP6 are now regarded as implausible by the United Nations Scientific body on climate change. This was the basis of the Councils forecasting- so the Climate Adaption Plan needs to be re-visited.

I expect Hurunui District Council to make continued practical, evidence-based decisions that are proportionate to the risks the Amberley Beach residents face and in ongoing partnership with them . This Plan change request defaults to worst-case assumptions

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

I am seeking the consent authority to **decline** the Plan Change request

Upload any supporting documents here:**Do you wish to be heard in support of your submission? ***

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter**Address: ***

Street Address

321 Georges Rd

Address Line 2

Glasnevin

City

Amberley

Postal / Zip Code

7482

State / Province / Region

North Canterbury

Country

New Zealand

Phone number:

21,737,322

Email: *

louiselkw@outlook.com

Contact person:

Name and designation if applicable

Louise Webb

Note to submitter:

The closing date for serving submissions on the consent authority is the 20th working day after the date which notification is given **(5pm Friday 21 August 2026)**.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

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- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Gordon Legge

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

3.6 (4) both a and b

3.6 (5)

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

The whole concept of forcing a group of residents to be relocated in mass is reminiscent of the justification for relocation we see in Gaza or what happened in Warsaw. While it is very emotive to quote those two examples the concept of mass relocation remains the same.

The residents of Amberley beach bought their at Amberley Beach of there own free will, they live their happily and should be allowed to remain.

This concept should never have been allowed to proceed without the total support of the residents.

With their actions the HDC has opened itself up to the prospect of a class action by the residents. HDC's action will have caused a dramatic drop in property values for the over 100 residents. Let's say each property has now dropped in value by \$300,000. 100 X \$300,000 is a massive \$30m liability that HDC has opened itself it to.

Yes there can be no doubt that there is climate change but to claim flooding by dramatic rises in sea level, where is the evidence?

I would submit that there is none.

When the government said councils should stick to their core activities this is exactly the type of activity that councils should not engage in.

Councils are not property developers, they have no expertise and they have no mandate to take undue risks with ratepayers money

There is no just cause for this proposed development and therefor no justification for the proposed zoning change sought by HDC.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

That the planning change sought by HDC be rejected

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter**Address: ***

Street Address

321 Georges Rd

Address Line 2

RD2 Amberley

City

Amberley

State / Province / Region

Canterbury

Postal / Zip Code

7482

Country

NZ

Phone number:

219,449,895

Email: *

gordon@leggework.co.nz

Contact person:

Name and designation if applicable

Note to submitter:

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- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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To: Hurunui District Council

Name of submitter: *

Josi Hamill

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The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Policy 4.32(v), 5.6.11.2(a)

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

In support of PC7, with emphasis on the need for relocation, the site's stability, and recommendations for mitigation methods along the beachfront.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

Upload any supporting documents here:

Submission_PC7.docx

1.63MB

Do you wish to be heard in support of your submission? *

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter

Address: *

Street Address

33a Kirkwood Avenue

Address Line 2

City

Christchurch

State / Province / Region

canterbury

Postal / Zip Code

8041

Country

New Zealand

Phone number:

226,895,932

Email: *

josiwhamill@gmail.com

Contact person:

Name and designation if applicable

Note to submitter:

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Submission on Plan Change 7

To the Hurunui district council,

Regarding: <https://www.hurunui.govt.nz/have-your-say/consultations?item=id:2yk8g7ajz17q9sipdnch>

Thank you for the opportunity to make a submission regarding the **rezoning of 185 Ashworths Road from Rural Zone to Residential 1 Zone** and development policies associated with **Plan Change 7**.

I am submitting as an undergraduate student at the University of Canterbury. I study environmental science and hail from Ōtautahi | Christchurch.

Stance

According to the evidence of risk facing the Amberley Beach Settlement, I am in support of the proposed *Plan Change 7*.

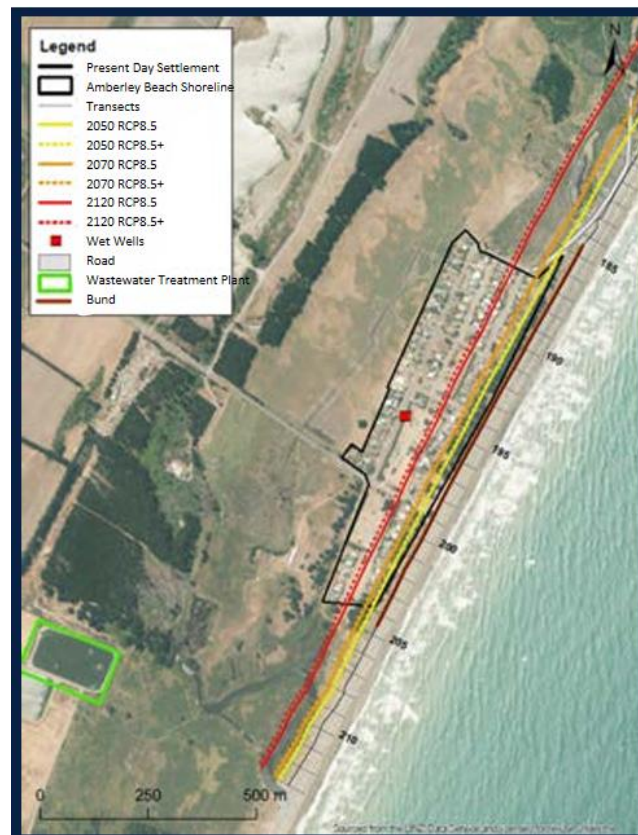
The proposed conversion of 185 Ashworths Road into residential land allows for a managed retreat of the settlement inland, away from increasing risks associated with climate change. This provides more options for residents, council, and business owners to respond to environmental challenges in a way that protects the existing community, creates opportunities for growth, and increases the resilience of our natural heritage in a changing environment.

Sea level rise poses a risk to the community.

- Sea level rise (SLR) in New Zealand is projected to be 25cm in current global warming scenarios for 2050. This puts **coastal settlements, economic areas, and habitats at risk** (NIWA, n.d.).
- Due to its low elevation and geology, Amberley Beach Settlement is at higher risk of cyclones, storm surges, coastal inundation, and shoreline erosion compared to inland settlements. These events pose a **danger to the wellbeing of residents and visitors** (Hurunui District Council, 2023; Abdelhafez et al., 2024).
- As seen in Figure 1, **long-term shoreline erosion will encroach on residential lots** by as early as 2050.

Figure 1

Projected Shoreline Retreat at Amberley Beach Settlement in 2050, 2070, and 2120



Note: The assumed Representative Concentration Pathways (RCP) of global greenhouse gas (GHG) emissions are at or above 8.5, which assumes the current status quo is maintained (RCP8.5) or GHG emissions increase (RCP8.5+). By 2070, the easternmost lots would be claimed by the approaching shoreline. By 2120, this would extend to the middle of the settlement. From *Amberley Beach Coastal Adaptation Plan*, by Hurunui District Council, March 2023.

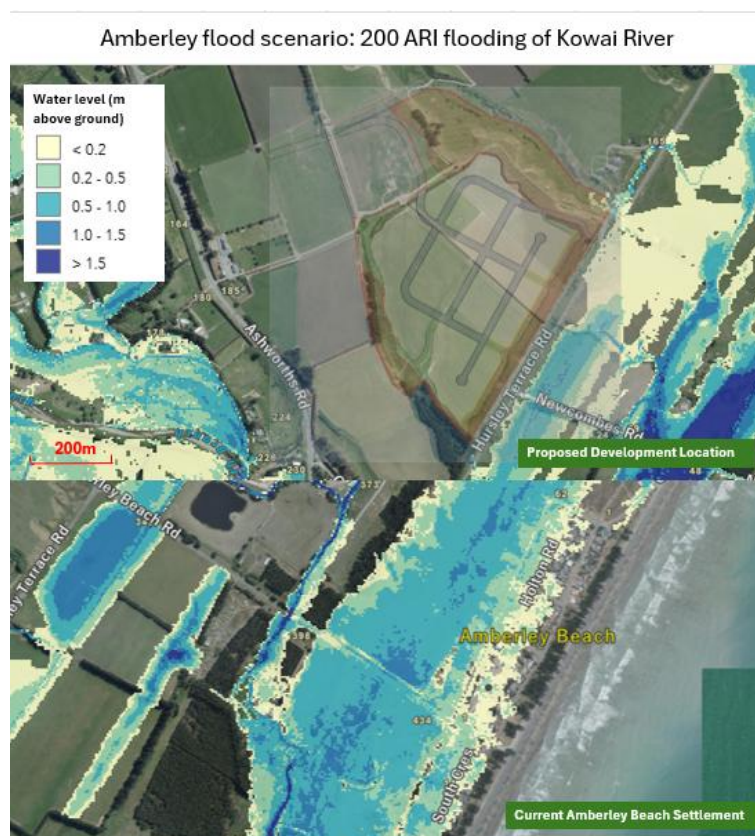
(https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcid/hierarchy/Regulatory_Services/Coastal_conversations/Amberley-Beach-Draft-Coastal-%20Adaptation-Plan.pdf)

The property is in a suitable location.

- 185 Ashworths Road section is **not at risk of flooding or related coastal hazards** (see Figure 2).
- At 2km from the coast, the property is **close enough to retain a sense of ‘beach culture’** and a view of the ocean.
- Its proximity to arterial roads, Ashworths and Hussley Terrace Roads, provides **access to amenities, local businesses, and natural features**.
- **The size creates opportunity for growth.** Of the 230 proposed lots, only 109 are reserved for current residents. Selling the remaining 121 on the market enables the community and local economy to grow and diversify, balancing the council’s cost of property investment and increasing the community’s vibrancy.

Figure 2

Amberley flood scenario: 200 ARI flooding of Kowai River



Note: 1-in-200-year-flood (200 ARI) projections show that site is not at risk of flooding, whereas the current settlement has a high risk of submersion. Adapted from *Flood Model Results*, Land Information New Zealand, n.d. (<https://apps.canterburymaps.govt.nz/FloodModelResults/>), and *Outline Development Plan*, Hurunui District Council, 2026 (<https://www.hurunui.govt.nz/have-your-say/consultations?item=id:2yk8g7ajz17q9sipdnch>)

Opposition & Recommendations

“Why would residents relinquish equity in current homes to buy empty lots?”

- **The risk associated with SLR is growing**, and it is likely that insurance companies will cease to cater for compromised homes in the coming decades. Weather events that destroy land and infrastructure are increasing in frequency, with Canterbury experiencing 15% more intense rainfall events than previously (Ministry for Cities, Environment, Regions & Transport, 2023). The question is not “if”, but rather, “when” these events will cause catastrophic harm.
- **A changing environment requires us to adapt** if we wish to maintain our quality of life and build a strong foundation for the generations that come after us. Choosing inaction worsens the consequences of those forced to act later. Residents are encouraged to weigh up the short-term loss of equity in view of the long-term benefits that include and extend beyond their lifetimes.

It is also important to consider what would be done with the *abandoned residential lots at the current beach settlement*, given residents choose to relocate before the settlement is deemed unsafe. Due to the settlement’s risk of coastal hazards, increasing salinisation associated with sea level rise, and imminent emigration of residents, it would be unsuitable for economic activities such as agriculture and business development. Therefore, I recommend the following options:

- **Coastal wetland regeneration.**
Coastal wetlands act as a buffer for coastal hazards such as storm surges, stabilise the soil from erosion, and provide alternative habitats for native species at risk of losing current habitats, such as the Banded Dotterel (Rare Species, n.d.).
- **Strengthening of mitigation infrastructure.**
Constructing larger rock revetments along the current will mitigate the short-term impacts of erosion and coastal hazards acting against the current settlement, providing time for residents to relocate.

It is important to note that the above recommendations will *not totally protect the area* from permanent salinisation and risks of sea level rise, however, these mitigation options will reduce the short- to medium-term impacts on local natural and agricultural ecosystems and create more time for residents, council, farmers, and business owners to adapt appropriately (Herbert et al., 2015). These issues will ultimately require holistic measures that include both natural and human elements, such as altering irrigation practises and freshwater stewardship, to ensure a safe and sustainable future of settlements and industries in the Amberley region for years to come.

REFERENCES

- Abdelhafez, M. A., Mahmoud, H. N., & Ellingwood, B. R. (2024). Adjusting to the reality of sea level rise: reshaping coastal communities through resilience-informed adaptation. *Climatic Change* 177, 110. <https://doi.org/10.1007/s10584-024-03763-w>
- Herbert, E. R., Boon, P., Burgin, A. J., Neubauer, S. C., Franklin, R. B., Ardon, M., Hopfensperger, K. N., Lamers, L. P. M., Gell, P., Langley, J. A. (2015). A global perspective on wetland salinization: Ecological consequences of a growing threat to freshwater wetlands. *Ecosphere*, 6(1), 206. <https://doi.org/10.1890/ES14-00534.1>
- Hurunui District Council (2023). *Amberley beach coastal adaptation plan: Draft for engagement March 2023*. https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Regulatory_Services/Coastal_conversations/Amberley-Beach-Draft-Coastal-%20Adaptation-Plan.pdf
- Land Information New Zealand (n.d.). *Flood Model Results*. New Zealand Government. <https://apps.canterburymaps.govt.nz/FloodModelResults/>
- Ministry for Cities, Environment, Regions & Transport (2023). *The science linking extreme weather and climate change*. New Zealand Government. <https://environment.govt.nz/news/the-science-linking-extreme-weather-and-climate-change/>
- National Institute of Water and Atmospheric Research (n.d.). *Sea-level Rise: One of the major consequences of climate change is rising global sea levels*. <https://niwa.co.nz/hazards/sea-level-rise>
- Rare Species (n.d.). *Banded dotterel (Charadrius bicinctus bicinctus)*. New Zealand Forest Owners Association. <https://rarespecies.nzfoa.org.nz/species/banded-dotterel/>

HURUNUI DISTRICT COUNCIL FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date: 18/8/26.

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

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The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

1. Submitter details:

Name/s: (Full name) David UREN.
Jenny UREN.

Contact person: David Designation: OWNER.

Address for service:

18 Teuotueiu Place.
Amberley.

tullamore farm &

Email address: outlook.com Telephone: 022 174 5707

2. For the purposes of section 308B of the Resource Management Act 1991:

☐ I am a trade competitor, and I am ☐ or I am not ☐ directly affected by an effect of the subject matter of the submission that:

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I/we oppose Plan Change 7 in its entirety.

The reasons for my/our opposition are set out below.

1. Highly Productive Land – Loss of Rural Capability

The plan change would convert a large area of rural land—currently zoned for productive use—into residential lots (approx. 200–230 lots). This directly conflicts with the District Plan’s intent to protect rural land for long-term productive use and avoid unnecessary conversion to urban zoning. The Council itself acknowledges that **productive land status** is a key matter to be weighed by commissioners.

Key concerns:

- **Permanent loss of highly productive land:** Once rezoned and subdivided, this land cannot be returned to rural production.
- **Contradiction with national direction:** Government guidance has recently emphasised that **extreme climate scenarios should not be used to justify rezoning highly productive land**, and councils must rely on robust evidence and independent scrutiny.
- **No demonstrated necessity:** The plan change is framed as “proactive relocation,” yet the Council acknowledges uncertainty about future hazard timelines. The proposal is therefore premature and not justified by immediate need.

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Rezoning rural land to residential introduces new residents who may be unfamiliar with rural activities, creating **reverse sensitivity** pressures on established farming operations.

Specific risks:

- **Complaints about noise, dust, odour, heavy machinery, and early-morning operations** typical of rural production.
- **Pressure on Council to impose new restrictions** on farming activities to “protect” residential amenity.
- **Conflict with District Plan objectives** that seek to maintain rural character and enable ongoing agricultural activity without urban constraints.

The proposed Outline Development Zone and Residential 1 zoning would place hundreds of new dwellings directly adjacent to active rural land uses, creating unavoidable conflict.

3. Inadequate Evidence for Climate-Driven Relocation

The plan change is justified primarily based on coastal hazard risk at Amberley Beach. However:

- The Amberley Beach Residents’ Association has raised concerns that the adaptation plan relies on **extreme climate scenarios**, which Government has recently stated should **not** be treated as the most likely future for land-use decisions.
- The Council’s own consultant acknowledges that assessments show the site is “appropriate provided effects are mitigated,” which is not a strong justification for rezoning highly productive land.
- The proposal is described as a “concept” still needing to work through implications. This is not sufficient certainty to justify rezoning rural land.

The relocation rationale is therefore **not robust enough** to outweigh the significant adverse effects of converting productive rural land to residential.

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The Hurunui District Plan seeks to:

- Protect rural land for long-term productive use
- Avoid sporadic or ad-hoc residential expansion into rural zones
- Maintain rural character and avoid land-use conflicts
- Ensure subdivision occurs in appropriate, planned locations

PC7 contradicts these objectives by:

- Creating a large, standalone residential enclave in a rural setting
- Introducing urban density incompatible with surrounding land uses
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Traffic Reports: NZTA claims current traffic is 539 vehicles per day on Hursley Terrace Road.

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- **Commercial pressure** to approve the plan change regardless of planning merit
- **Risk of urban sprawl** driven by financial motives rather than sound land-use planning
- **Potential inequity** for neighbouring landowners who bear the burden of reverse sensitivity and loss of rural amenity

5. I seek the following decision from the Council:

Please give precise details, including the general nature of any conditions sought.

I request that the Hearings Panel:

1. **Decline Plan Change 7 in full**, retaining the Rural Zone over the site.
2. **Require Council to reassess relocation options** using updated, evidence-based climate hazard modelling.
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4. **Avoid reverse-sensitivity conflicts** by keeping residential development within existing urban zones or areas already identified for growth.
5. **Ensure future planning decisions align with District Plan objectives** for rural land protection and sustainable development.

Plan Change 7 is not justified, not aligned with the District Plan, and not supported by robust evidence. It would permanently remove highly productive rural land, create significant reverse-sensitivity issues for neighbouring landowners, and introduce urban development into an area not suited for it. For these reasons, I strongly oppose PC7 and request that it be declined.

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I wish to be heard in support of my submission: YES ☐ NO ☒

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HURUNUI DISTRICT COUNCIL

FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



18 AUG 2026

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To: Hurunui District Council

Date: 15/8/26

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1. Submitter details:

Name/s: (Full name)

Trevor Brown

Contact person:

Trevor

Designation:

Owner

Address for service:

213 Hurstly Terrace RD
RD, Amberley

Email address:

trevorjb3@hotmail.co.nz

Telephone:

0273941144

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☐

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Clause 6 of Schedule 1, Resource Management Act 1991



RECEIVED

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1. Submitter details:

Name/s: (Full name)

Bruce James Johns

Contact person:

above

Designation:

retired

Address for service:

20 Ropley St.
Amberley.

Email address:

brucejohns.nz@gmail.com

Telephone:

027 399 9055

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If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☒ NO ☐

Notes:

- The closing date for serving submissions on the consent authority is the 20th working day after the date on which notification is given **(5pm Friday 21 August 2026)**.
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- Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

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If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

HURUNUI DISTRICT COUNCIL FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date: 17/8/2026

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

Plan Change 7 – Rosewood Terrace

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

1. Submitter details:

Name/s: (Full name)

David & Vicki Sanford

Contact person: Vicki

Designation: owner / resident

Address for service: 203 Hursley Terrace Road
RD 1 Amberley.

Email address: dvsanford@xtra.co.nz

Telephone: 021-265-1843

2. For the purposes of section 308B of the Resource Management Act 1991:

☐ I am a trade competitor, and I am ☐ or I am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) Adversely affects the environment; and

(b) Does not relate to trade competition or the effects of trade competition.



I am not a trade competitor

3. The specific provisions of the proposal that my submission relates to are:

I oppose all provisions that:

- Rezone rural land to **Residential 1 Zone**
- Introduce an **Outline Development Zone**
- Enable subdivision for approximately 200–230 residential lots
- Remove or weaken rural zoning protections
- Introduce new rules, exemptions, or non-complying triggers to facilitate residential development on rural land

4. My submission is in ☐ support ☒ opposition (tick applicable)

Include whether you support, oppose or are neutral to specific parts of the application or wish to have them amended and provide reasons for your views. This may be provided on a separate sheet if you need more space.

I/we [^]oppose Plan Change 7 in its entirety.

The reasons for my/our opposition are set out below.

1. Highly Productive Land – Loss of Rural Capability

The plan change would convert a large area of rural land—currently zoned for productive use—into residential lots (approx. 200–230 lots). This directly conflicts with the District Plan’s intent to protect rural land for long-term productive use and avoid unnecessary conversion to urban zoning. The Council itself acknowledges that **productive land status** is a key matter to be weighed by commissioners.

Key concerns:

- **Permanent loss of highly productive land:** Once rezoned and subdivided, this land cannot be returned to rural production.
- **Contradiction with national direction:** Government guidance has recently emphasised that **extreme climate scenarios should not be used to justify rezoning highly productive land**, and councils must rely on robust evidence and independent scrutiny.
- **No demonstrated necessity:** The plan change is framed as “proactive relocation,” yet the Council acknowledges uncertainty about future hazard timelines. The proposal is therefore premature and not justified by immediate need.

2. Reverse Sensitivity Effects on Existing Rural Landowners

Rezoning rural land to residential introduces new residents who may be unfamiliar with rural activities, creating **reverse sensitivity** pressures on established farming operations.

Specific risks:

- **Complaints about noise, dust, odour, heavy machinery, and early-morning operations** typical of rural production.
- **Pressure on Council to impose new restrictions** on farming activities to “protect” residential amenity.
- **Conflict with District Plan objectives** that seek to maintain rural character and enable ongoing agricultural activity without urban constraints.

The proposed Outline Development Zone and Residential 1 zoning would place hundreds of new dwellings directly adjacent to active rural land uses, creating unavoidable conflict.

3. Inadequate Evidence for Climate-Driven Relocation

The plan change is justified primarily based on coastal hazard risk at Amberley Beach. However:

- The Amberley Beach Residents’ Association has raised concerns that the adaptation plan relies on **extreme climate scenarios**, which Government has recently stated should **not** be treated as the most likely future for land-use decisions.
- The Council’s own consultant acknowledges that assessments show the site is “appropriate provided effects are mitigated,” which is not a strong justification for rezoning highly productive land.
- The proposal is described as a “concept” still needing to work through implications. This is not sufficient certainty to justify rezoning rural land.

The relocation rationale is therefore **not robust enough** to outweigh the significant adverse effects of converting productive rural land to residential.

4. Conflicts with District Plan Objectives and Rural Zoning Purpose

The Hurunui District Plan seeks to:

- Protect rural land for long-term productive use
- Avoid sporadic or ad-hoc residential expansion into rural zones
- Maintain rural character and avoid land-use conflicts
- Ensure subdivision occurs in appropriate, planned locations

PC7 contradicts these objectives by:

- Creating a large, standalone residential enclave in a rural setting
- Introducing urban density incompatible with surrounding land uses
- Requiring new rules, exemptions, and special provisions (e.g., removal of staging limits, new yard rules, non-complying triggers) to force residential development into an area not suited for it

This demonstrates that the land is **not naturally appropriate** for residential zoning under the District Plan framework.

5. Traffic

Traffic Reports: NZTA claims current traffic is 539 vehicles per day on Hursley Terrace Road.

Adding 238 suburban lots (more than double the size of Amberley Beach) will easily push traffic over 1,000 VPD, as Hursley Terrace Road is the fastest route to Amberley amenities and avoids dangerous highway intersections.

The lack of public and active transport options, and the absence of amenities, means PC 7 does not provide for the broader diversity of needs expected in a well-functioning urban environment.

6. Economic and Community Impacts

The Council intends to sell remaining sections on the open market to cover costs of land purchase and plan change process. This creates:

- **Commercial pressure** to approve the plan change regardless of planning merit
- **Risk of urban sprawl** driven by financial motives rather than sound land-use planning
- **Potential inequity** for neighbouring landowners who bear the burden of reverse sensitivity and loss of rural amenity

5. I seek the following decision from the Council:

Please give precise details, including the general nature of any conditions sought.

I request that the Hearings Panel:

1. **Decline Plan Change 7 in full**, retaining the Rural Zone over the site.
2. **Require Council to reassess relocation options** using updated, evidence-based climate hazard modelling.
3. **Protect highly productive rural land** from unnecessary rezoning.
4. **Avoid reverse-sensitivity conflicts** by keeping residential development within existing urban zones or areas already identified for growth.
5. **Ensure future planning decisions align with District Plan objectives** for rural land protection and sustainable development.

Plan Change 7 is not justified, not aligned with the District Plan, and not supported by robust evidence. It would permanently remove highly productive rural land, create significant reverse-sensitivity issues for neighbouring landowners, and introduce urban development into an area not suited for it. For these reasons, I strongly oppose PC7 and request that it be declined.

Why did the council buy an 86-hectare farm when they only needed 34 hectares? It is not the core job of council to be property developers because it puts them in direct competition with commercial operations. Their role is to oversee and make responsible decisions with rate payer's money.

6. Hearing:

I wish to be heard in support of my submission: YES ☐ NO ☒

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☒ NO ☐

Notes:

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HURUNUI DISTRICT COUNCIL

FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date: 14/8/26

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

Plan Change 7 – Rosewood Terrace

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

1. Submitter details:

Name/s: (Full name)

Lorraine Dunning

Contact person:

Designation:

Address for service:

217 Hursley Terrace Road
AmberleyEmail address: ldunning@gn.net.nz

Telephone: 0274206242

2. For the purposes of section 308B of the Resource Management Act 1991:

☐ I am a trade competitor, and I am ☐ or I am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) Adversely affects the environment; and

(b) Does not relate to trade competition or the effects of trade competition.



I am not a trade competitor

3. The specific provisions of the proposal that my submission relates to are:

I oppose all provisions that:

- Rezone rural land to **Residential 1 Zone**
- Introduce an **Outline Development Zone**
- Enable subdivision for approximately 200–230 residential lots
- Remove or weaken rural zoning protections
- Introduce new rules, exemptions, or non-complying triggers to facilitate residential development on rural land

4. My submission is in ☐ support ☒ opposition (tick applicable)

Include whether you support, oppose or are neutral to specific parts of the application or wish to have them amended and provide reasons for your views. This may be provided on a separate sheet if you need more space.

I/we oppose Plan Change 7 in its entirety.

The reasons for my/our opposition are set out below.

1. Highly Productive Land – Loss of Rural Capability

The plan change would convert a large area of rural land—currently zoned for productive use—into residential lots (approx. 200–230 lots). This directly conflicts with the District Plan’s intent to protect rural land for long-term productive use and avoid unnecessary conversion to urban zoning. The Council itself acknowledges that **productive land status** is a key matter to be weighed by commissioners.

Key concerns:

- **Permanent loss of highly productive land:** Once rezoned and subdivided, this land cannot be returned to rural production.
- **Contradiction with national direction:** Government guidance has recently emphasised that **extreme climate scenarios should not be used to justify rezoning highly productive land**, and councils must rely on robust evidence and independent scrutiny.
- **No demonstrated necessity:** The plan change is framed as “proactive relocation,” yet the Council acknowledges uncertainty about future hazard timelines. The proposal is therefore premature and not justified by immediate need.

2. Reverse Sensitivity Effects on Existing Rural Landowners

Rezoning rural land to residential introduces new residents who may be unfamiliar with rural activities, creating **reverse sensitivity** pressures on established farming operations.

Specific risks:

- **Complaints about noise, dust, odour, heavy machinery, and early-morning operations** typical of rural production.
- **Pressure on Council to impose new restrictions** on farming activities to “protect” residential amenity.
- **Conflict with District Plan objectives** that seek to maintain rural character and enable ongoing agricultural activity without urban constraints.

The proposed Outline Development Zone and Residential 1 zoning would place hundreds of new dwellings directly adjacent to active rural land uses, creating unavoidable conflict.

3. Inadequate Evidence for Climate-Driven Relocation

The plan change is justified primarily based on coastal hazard risk at Amberley Beach. However:

- The Amberley Beach Residents’ Association has raised concerns that the adaptation plan relies on **extreme climate scenarios**, which Government has recently stated should **not** be treated as the most likely future for land-use decisions.
- The Council’s own consultant acknowledges that assessments show the site is “appropriate provided effects are mitigated,” which is not a strong justification for rezoning highly productive land.
- The proposal is described as a “concept” still needing to work through implications. This is not sufficient certainty to justify rezoning rural land.

The relocation rationale is therefore **not robust enough** to outweigh the significant adverse effects of converting productive rural land to residential.

4. Conflicts with District Plan Objectives and Rural Zoning Purpose

The Hurunui District Plan seeks to:

- Protect rural land for long-term productive use
- Avoid sporadic or ad-hoc residential expansion into rural zones
- Maintain rural character and avoid land-use conflicts
- Ensure subdivision occurs in appropriate, planned locations

PC7 contradicts these objectives by:

- Creating a large, standalone residential enclave in a rural setting
- Introducing urban density incompatible with surrounding land uses
- Requiring new rules, exemptions, and special provisions (e.g., removal of staging limits, new yard rules, non-complying triggers) to force residential development into an area not suited for it

This demonstrates that the land is **not naturally appropriate** for residential zoning under the District Plan framework.

5. Traffic

Traffic Reports: NZTA claims current traffic is 539 vehicles per day on Hursley Terrace Road.

Adding 238 suburban lots (more than double the size of Amberley Beach) will easily push traffic over 1,000 VPD, as Hursley Terrace Road is the fastest route to Amberley amenities and avoids dangerous highway intersections.

The lack of public and active transport options, and the absence of amenities, means PC 7 does not provide for the broader diversity of needs expected in a well-functioning urban environment.

6. Economic and Community Impacts

The Council intends to sell remaining sections on the open market to cover costs of land purchase and plan change process. This creates:

- **Commercial pressure** to approve the plan change regardless of planning merit
- **Risk of urban sprawl** driven by financial motives rather than sound land-use planning
- **Potential inequity** for neighbouring landowners who bear the burden of reverse sensitivity and loss of rural amenity

5. I seek the following decision from the Council:

Please give precise details, including the general nature of any conditions sought.

I request that the Hearings Panel:

1. **Decline Plan Change 7 in full**, retaining the Rural Zone over the site.
2. **Require Council to reassess relocation options** using updated, evidence-based climate hazard modelling.
3. **Protect highly productive rural land** from unnecessary rezoning.
4. **Avoid reverse-sensitivity conflicts** by keeping residential development within existing urban zones or areas already identified for growth.
5. **Ensure future planning decisions align with District Plan objectives** for rural land protection and sustainable development.

Plan Change 7 is not justified, not aligned with the District Plan, and not supported by robust evidence. It would permanently remove highly productive rural land, create significant reverse-sensitivity issues for neighbouring landowners, and introduce urban development into an area not suited for it. For these reasons, I strongly oppose PC7 and request that it be declined.

6. Hearing:

I wish to be heard in support of my submission: YES ☐ NO ☒

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☒ NO ☐

Notes:

- The closing date for serving submissions on the consent authority is the 20th working day after the date on which notification is given **(5pm Friday 21 August 2026)**.
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Form 5 - Submission on notified plan change proposal

Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Julie Nunn

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Irrespective of any specific provisions or rule numbers. My Submission relates to the overall proposed plan change to Plan Change 7 Rosewood Terrace at 185 Ashworths Road.

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

I oppose Plan Change 7 because I question the purpose of it as it is not based on current government approved modelling and assessment. The Plan Change in its current form has the potential to be used in other circumstances where alleged climate change and environmental requirements are perceived as necessary. This will have a detrimental impact on the Hurunui district as more productive land is given away to housing, this is a one way street the land will never be productive again. I also believe it is against stated HDC policy to build on productive land. I also oppose the plan on timing. Firstly there is no proven timeframe which shows the need to make any hasty decisions. Also as councils are disbanded and merged it is not a good time to push this change through.

The way that this Plan Change has been managed could in my opinion potentially leave rate payers being held liable for class actions as the value of Amberley Beach properties are severely impacted by HDC implanting this policy.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

A full rejection of Plan Change 7. A moratorium on expenditure by HDC on this Plan change until the Governments council restructuring is complete.

Upload any supporting documents here:**Do you wish to be heard in support of your submission? ***

No

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

No

Contact details for submitter

Address: *

Street Address

323 Georges Road, RD2

Address Line 2

Glasnevin

City

Glasnevin

Postal / Zip Code

7482

State / Province / Region

Region

Country

New Zealand

Phone number:

2,102,611,387

Email: *

julie.nunn@hotmail.com

Contact person:

Name and designation if applicable

Note to submitter:

The closing date for serving submissions on the consent authority is the 20th working day after the date which notification is given **(5pm Friday 21 August 2026)**.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Laura Fairbrass

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

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Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Letter Attached

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

Letter Attached

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

Letter Attached

Upload any supporting documents here:

Council Submission.pdf

110.31KB

Do you wish to be heard in support of your submission? *

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter

Address: *

Street Address

60 Newcombes Road

Address Line 2

R.D.1

City

Amberley

State / Province / Region

North Canterbury

Postal / Zip Code

7481

Country

New Zealand

Phone number:

211,043,650

Email: *

laura_cooper_1@hotmail.com

Contact person:

Name and designation if applicable

Note to submitter:

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If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

Submission on Proposed Plan Change 7 – Rosewood Terrace

To: Planning Team, Hurunui District Council

Submitter: Laura Fairbrass

Submission: I oppose Proposed Plan Change 7 – Rosewood Terrace.

Hearing: I wish to be heard in support of my submission. If others make a similar submission, I would consider presenting a joint case.

Reasons for Opposing the Plan Change

1. Loss of productive rural land

I am concerned that rezoning rural land at Rosewood Terrace for residential development would result in the permanent loss of productive rural land. Rural land is a finite resource and should be protected for food production, rural livelihoods, and the long-term resilience of the district. Once land is subdivided and developed for housing, it is effectively removed from rural production permanently.

The proposed rezoning appears to prioritise residential growth in a rural location before fully demonstrating that less productive, better serviced, or more appropriately zoned alternatives have been exhausted. I do not consider that the benefits of this plan change outweigh the loss of productive land and the precedent it may set for further rural-to-residential rezoning around Amberley.

2. Traffic and road safety effects

The development enabled by the plan change would add a significant number of residential lots and associated daily vehicle movements. This would increase pressure on the surrounding local road network, including access routes connecting the site with Amberley township, schools, services, and State Highway connections.

I am concerned that increased traffic could affect road safety, amenity, and travel times for existing residents and road users. Any development of this scale should not proceed unless there is clear evidence that the road network can safely and efficiently accommodate the additional traffic, and that all necessary upgrades will be delivered before or alongside development rather than after effects have occurred.

3. Infrastructure capacity and servicing

I am also concerned about whether existing and planned infrastructure can adequately support the proposed development. Additional housing would place greater demand on water supply, wastewater, stormwater, roads, footpaths, community facilities, and other services. These matters need to be fully resolved before rezoning is approved.

The plan change should not transfer infrastructure costs, risks, or long-term maintenance burdens to the wider community. If the proposal is advanced, Council should ensure that all infrastructure upgrades required to service the development are clearly identified, funded, staged appropriately, and secured before subdivision or residential development occurs.

4. Loss of rural identity and amenity

The proposal would also change the rural character and identity of the surrounding area. Existing rural properties rely on a rural setting, open space, separation between dwellings, and the ability to continue normal rural activities without increased reverse-sensitivity pressures from nearby residential development.

Introducing a large residential area into this rural environment would alter the character of the area and may adversely affect the amenity, expectations, and ongoing use of neighbouring rural properties. I am concerned that the plan change would erode the rural identity of Rosewood Terrace and the wider Amberley rural area.

5. Stormwater run-off, flooding risk, and waste management centre impacts

I am concerned that residential development of this scale could increase hard surfaces and stormwater run-off, which may worsen existing drainage and flooding issues in the area. Any additional run-off needs to be assessed carefully, including cumulative effects on downstream land, roads, drains, and existing infrastructure.

Particular consideration should be given to the potential effect of increased stormwater run-off and flooding on the current waste management centre. The plan change should not proceed unless Council is satisfied, based on robust technical evidence, that stormwater can be managed without increasing flood risk or creating adverse environmental, operational, or public health effects associated with the waste management centre.

6. Beach access impacts via Newcombes Road

I am concerned that the plan change would increase traffic using Newcombes Road for beach access. Newcombes Road is a rural road and is not formed, graded, or

maintained to cope with a significant increase in vehicle movements associated with residential growth and recreational beach access.

The road is narrow, with poor visibility to oncoming traffic in places. Increased use by residents, visitors, cyclists, pedestrians, and families accessing the beach would create additional safety risks for existing road users and for families living along Newcombes Road.

There is also no adequate parking or safe turning area at the end of the access road. Without properly designed and funded road upgrades, parking, turning, and safe pedestrian arrangements, increased beach access traffic would create avoidable hazards and adversely affect the safety and amenity of residents on Newcombes Road.

7. Loss of habitat for native birds and lizards

I am concerned that the proposed rezoning and development could result in the loss, fragmentation, or disturbance of habitat for native birds and lizards. Rural areas, shelterbelts, grassed areas, drains, and vegetation can provide important habitat and movement corridors for native species, even where land has been modified.

Before any rezoning is approved, there should be a robust ecological assessment of the site and surrounding area, including potential effects on native birds, lizards, nesting areas, food sources, and habitat connectivity. The plan change should not proceed unless Council is satisfied that adverse effects on native biodiversity can be avoided, remedied, or mitigated, and that any required protection or restoration measures are secured before development occurs.

8. Unsuitability of the location for domestic cats and dogs

I am concerned that the location is not suitable for a substantial increase in domestic cats and dogs associated with residential development. Additional domestic animals could create adverse effects on nearby rural properties, stock, native birds, lizards, and other wildlife, especially where residential development is located close to rural land, open spaces, drains, shelterbelts, and habitat corridors.

Dogs may create noise, roaming, stock-worrying, and safety concerns if not properly contained, while cats may prey on native birds and lizards. The rural road environment may also create animal welfare and road safety risks for pets and road users. These effects should be fully assessed before rezoning is approved, and Council should not approve the plan change unless it is satisfied that domestic animal impacts can be effectively managed and enforced.

9. Concerns about the basis for managed retreat reasoning

I am concerned that Council's logic for enabling this rezoning as part of managed retreat for Amberley Beach residents appears to rely on a report that was not intended to be

used in this context. If the report was prepared for a different purpose, then it should not be treated as a sufficient basis for a major land-use planning decision involving rural rezoning, infrastructure investment, and long-term community impacts.

I am also concerned if the report has not been peer reviewed and if its assumptions, data, or conclusions are no longer current or applicable. A decision of this scale should be based on robust, up-to-date, independently tested evidence that is directly relevant to the proposal. Council should not rely on outdated, unreviewed, or contextually inappropriate material to justify rezoning productive rural land for residential development.

10. Disruption from required infrastructure upgrades

I am concerned about the impact that required infrastructure upgrades would have on current rural residents. Upgrades to roads, stormwater, wastewater, water supply, and other services are likely to involve construction noise, heavy machinery, dust, vibration, road works, traffic disruption, and periods of reduced access. These effects would be disruptive for people currently living and working in the surrounding rural area.

These works may also disturb farm livestock through noise, sudden movements, additional vehicles, changed access arrangements, and disruption to normal farm routines. The plan change should not proceed unless the full scale, timing, duration, funding, and mitigation of required infrastructure works are clearly identified, and unless Council is satisfied that adverse effects on existing rural households, farming activities, and livestock can be avoided or appropriately managed.

There is also potential for prolonged traffic disruption on Hursley Terrace as development stages are progressively released. If infrastructure works, construction traffic, road upgrades, service connections, and subdivision works occur over a period of around five years, existing rural residents could face an extended period of disruption rather than a short-term impact. This would affect daily access, road safety, amenity, farm operations, and the wellbeing of residents and livestock along Hursley Terrace, Newcomes Road and Kowai River Road.

Decision Requested

I request that Hurunui District Council decline Proposed Plan Change 7 – Rosewood Terrace.

If Council is not minded to decline the plan change, I request that it be amended to provide stronger protection for productive rural land, clearer limits on development, and binding requirements for transport and infrastructure upgrades to be completed and funded before development proceeds.

If any future resource consents are sought for subdivision, earthworks, infrastructure upgrades, stormwater works, roading changes, beach access, or residential development associated with this project, I request that those applications be publicly notified. Public notification is important so that affected rural residents, road users, neighbouring property owners, and the wider community have a fair opportunity to review the details, assess the effects, and make submissions before further decisions are made.

HURUNUI DISTRICT COUNCIL FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date:

19 / 8 / 26

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

Plan Change 7 – Rosewood Terrace

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

1. Submitter details:

Name/s: (Full name)

Alan James Wilkinson

Contact person:

As Above

Designation:

Owner / Resident

Address for service:

29 Newcombes Rd
Amberley

willkinson@xtremaco.nz

Email address:

aj.wilkinson

Telephone:

027 253 3613

2. For the purposes of section 308B of the Resource Management Act 1991:

☐

I am a trade competitor, and I am ☐ or I am not ☐ directly affected by an effect of the subject matter of the submission that:

(a) Adversely affects the environment; and

(b) Does not relate to trade competition or the effects of trade competition.



I am not a trade competitor

3. The specific provisions of the proposal that my submission relates to are:

I oppose all provisions that:

- Rezone rural land to **Residential 1 Zone**
- Introduce an **Outline Development Zone**
- Enable subdivision for approximately 200–230 residential lots
- Remove or weaken rural zoning protections
- Introduce new rules, exemptions, or non-complying triggers to facilitate residential development on rural land

4. My submission is in ☐ support ☒ opposition (tick applicable)

Include whether you support, oppose or are neutral to specific parts of the application or wish to have them amended and provide reasons for your views. This may be provided on a separate sheet if you need more space.

I/we oppose Plan Change 7 in its entirety.

The reasons for my/our opposition are set out below.

1. Highly Productive Land – Loss of Rural Capability

The plan change would convert a large area of rural land—currently zoned for productive use—into residential lots (approx. 200–230 lots). This directly conflicts with the District Plan’s intent to protect rural land for long-term productive use and avoid unnecessary conversion to urban zoning. The Council itself acknowledges that **productive land status** is a key matter to be weighed by commissioners.

Key concerns:

- **Permanent loss of highly productive land:** Once rezoned and subdivided, this land cannot be returned to rural production.
- **Contradiction with national direction:** Government guidance has recently emphasised that **extreme climate scenarios should not be used to justify rezoning highly productive land**, and councils must rely on robust evidence and independent scrutiny.
- **No demonstrated necessity:** The plan change is framed as “proactive relocation,” yet the Council acknowledges uncertainty about future hazard timelines. The proposal is therefore premature and not justified by immediate need.

2. Reverse Sensitivity Effects on Existing Rural Landowners

Rezoning rural land to residential introduces new residents who may be unfamiliar with rural activities, creating **reverse sensitivity** pressures on established farming operations.

Specific risks:

- **Complaints about noise, dust, odour, heavy machinery, and early-morning operations** typical of rural production.
- **Pressure on Council to impose new restrictions** on farming activities to “protect” residential amenity.
- **Conflict with District Plan objectives** that seek to maintain rural character and enable ongoing agricultural activity without urban constraints.

The proposed Outline Development Zone and Residential 1 zoning would place hundreds of new dwellings directly adjacent to active rural land uses, creating unavoidable conflict.

3. Inadequate Evidence for Climate-Driven Relocation

The plan change is justified primarily based on coastal hazard risk at Amberley Beach. However:

- The Amberley Beach Residents’ Association has raised concerns that the adaptation plan relies on **extreme climate scenarios**, which Government has recently stated should **not** be treated as the most likely future for land-use decisions.
- The Council’s own consultant acknowledges that assessments show the site is “appropriate provided effects are mitigated,” which is not a strong justification for rezoning highly productive land.
- The proposal is described as a “concept” still needing to work through implications. This is not sufficient certainty to justify rezoning rural land.

The relocation rationale is therefore **not robust enough** to outweigh the significant adverse effects of converting productive rural land to residential.

4. Conflicts with District Plan Objectives and Rural Zoning Purpose

The Hurunui District Plan seeks to:

- Protect rural land for long-term productive use
- Avoid sporadic or ad-hoc residential expansion into rural zones
- Maintain rural character and avoid land-use conflicts
- Ensure subdivision occurs in appropriate, planned locations

PC7 contradicts these objectives by:

- Creating a large, standalone residential enclave in a rural setting
- Introducing urban density incompatible with surrounding land uses
- Requiring new rules, exemptions, and special provisions (e.g., removal of staging limits, new yard rules, non-complying triggers) to force residential development into an area not suited for it

This demonstrates that the land is **not naturally appropriate** for residential zoning under the District Plan framework.

5. Traffic

Traffic Reports: NZTA claims current traffic is 539 vehicles per day on Hursley Terrace Road.

Adding 238 suburban lots (more than double the size of Amberley Beach) will easily push traffic over 1,000 VPD, as Hursley Terrace Road is the fastest route to Amberley amenities and avoids dangerous highway intersections.

The lack of public and active transport options, and the absence of amenities, means PC 7 does not provide for the broader diversity of needs expected in a well-functioning urban environment.

6. Economic and Community Impacts

The Council intends to sell remaining sections on the open market to cover costs of land purchase and plan change process. This creates:

- **Commercial pressure** to approve the plan change regardless of planning merit
- **Risk of urban sprawl** driven by financial motives rather than sound land-use planning
- **Potential inequity** for neighbouring landowners who bear the burden of reverse sensitivity and loss of rural amenity

5. I seek the following decision from the Council:

Please give precise details, including the general nature of any conditions sought.

I request that the Hearings Panel:

1. **Decline Plan Change 7 in full**, retaining the Rural Zone over the site.
2. **Require Council to reassess relocation options** using updated, evidence-based climate hazard modelling.
3. **Protect highly productive rural land** from unnecessary rezoning.
4. **Avoid reverse-sensitivity conflicts** by keeping residential development within existing urban zones or areas already identified for growth.
5. **Ensure future planning decisions align with District Plan objectives** for rural land protection and sustainable development.

Plan Change 7 is not justified, not aligned with the District Plan, and not supported by robust evidence. It would permanently remove highly productive rural land, create significant reverse-sensitivity issues for neighbouring landowners, and introduce urban development into an area not suited for it. For these reasons, I strongly oppose PC7 and request that it be declined.

Why did the council buy an 86-hectare farm when they only needed 34 hectares? It is not the core job of council to be property developers because it puts them in direct competition with commercial operations. Their role is to oversee and make responsible decisions with rate payer's money.

6. Hearing:

I wish to be heard in support of my submission: YES ☐ NO ☒

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☒ NO ☐

Notes:

- The closing date for serving submissions on the consent authority is the 20th working day after the date on which notification is given (**5pm Friday 21st August 2026**).
- If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
- Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

HURUNUI DISTRICT COUNCIL

FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991



RECEIVED

19 AUG 2026

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date: 18 August 2026

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

Plan Change 7 – Rosewood Terrace

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

1. Submitter details:

Name/s: (Full name)

Wayne Gregory Sargent Chisnall & Jennifer Linley Chisnall

Contact person: Wayne

Designation: Owner/Resident

Address for service: 165 Hursley Terrace Road, RD 1, Amberley

Email address:

thedownsangus@amuri.net

Telephone: 027 471 2078

2. For the purposes of section 308B of the Resource Management Act 1991:

☐ I am a trade competitor, and I am ☐ or I am not ☐ directly affected by an effect of the subject matter of the submission that:

- (a) Adversely affects the environment; and
- (b) Does not relate to trade competition or the effects of trade competition.

☒ I am not a trade competitor

3. The specific provisions of the proposal that our submission relates to are:

We are totally opposed to Land Use Plan Change 7 and the proposed neighbouring subdivision in its entirety.

The specific provisions of our submission are:-

1. **Rezoning highly productive LUC2 farmland from rural to residential use**, resulting in the permanent loss of valuable productive agricultural land.
2. **Failure to give effect to the National Policy Statement for Highly Productive Land and HDC's own District Plan**, particularly the policies intended to protect highly productive land from inappropriate subdivision and development.
3. **The establishment of a high-density satellite subdivision immediately adjacent to our farming operation**, creating significant adverse reverse-sensitivity effects and potentially constraining our ability to continue normal farming activities. This is further compounded by the likely **ten-year period of development and construction**.
4. **The implications of a significant increase in traffic movements along Hursley Terrace Road**, including the potential effects on road safety, traffic flow, and the day-to-day operation of our farming activities.
5. Claiming the project is **cost-neutral** is subject to a wide range of assumptions, creating a potential risk and debt for ratepayers for years to come.
6. If a significant majority of **Amberley Beach residents** either do not want to relocate or/and cannot afford to do so, is **proactive relocation** realistically achievable for the residents?

4. My submission is in ☐ support ☒ opposition (tick applicable)

Include whether you support, oppose or are neutral to specific parts of the application or wish to have them amended and provide reasons for your views. This may be provided on a separate sheet if you need more space.

Submitter: We are the owners of 165 Hursley Terrace Road, which was the home to The Downs Angus Cattle Stud and Hursley Downs Southdown Sheep Stud. Our property is situated along the northern boundary of Rosewood, directly across from Dry Gully and over Hursley terrace Road to the east of the proposed subdivision. It comprises 80 hectares of land classified as LUC 2, which is recognised as some of the highest-quality and most versatile agricultural land in New Zealand. This highly productive land is an important resource for maintaining and supporting New Zealand's long-term food security.

We have farmed this property for the past 20 years and currently run approximately 140 cattle and 150 ewes, while also trading approximately 400 fat lambs. At any one time, our farming operation carries in excess of 1,000 stock units.

The reasons for our opposition are set out below: -

Reverse Sensitivity: Introducing suburban density into a rural zone will lead to inevitable complaints from new residents regarding lawful, pre-existing rural activities. The reverse sensitivity risk is that new residents, unfamiliar with rural life or simply less tolerant of these effects than a working farmer would be, start complaining — to the farmer directly, or via noise complaints, resource consent objections, or council enforcement requests.

Trees and open space may screen houses visually, but they do not necessarily address: sheep and cattle noise; lambing and stock movements; barking farm dogs; machinery operated early in the morning or at night; dust; odour; fertiliser application; agrichemical spraying; flies; stock trucks; temporary lighting; fencing disputes; dogs entering paddocks; residents feeding or disturbing stock; complaints about animal welfare or rural operations; pressure to restrict lawful farming hours and methods; biosecurity risks; or conflict between children, walkers and farm vehicles.

Over time this can create practical and legal pressure on the us as farmers to change how we operate— effectively constraining productive rural activity that was there first, to protect the amenity of the new residential use. This is significant in the context of a plan change involving highly productive land, because it's one of the ways rezoning can erode agricultural productivity in the surrounding area even without a single additional hectare of farmland being formally rezoned — the mere presence of housing next door changes what we as farmers can practically do.

This effect has not been appropriately addressed by PC7.

Protection of Highly Productive Agricultural Land

Loss of Productive Farm: Rosewood is also a highly productive LUC2 land, capable of intensive cropping and premium livestock finishing (previously running 900 ewes, 60 cattle, and small seeds). The RMM Landscape Architect report falsely claims the area only has "some cattle and a few sheep," ignoring the property's actual high-intensity farming capacity.

Policy Contradiction: Converting this land into a housing subdivision causes an irreversible loss of productive soil, directly violating HDC's own **District Plan** policy and Objective on highly productive land.

Objective 3.1

"The character and amenity values of rural areas of the district are maintained while providing for a variety of activities including those associated with primary production."

Policy 3.2 "To protect highly productive soils by discouraging activities that will have adverse effects on their continued productive use and life-supporting characteristics that a difficult to reverse." This refers to keeping residential activities away from incompatible rural zones.

NPS-HPL: Clause 3.6(4) (a): Urban Zoning Not Required to Meet Expected Demand

Council has not demonstrated that urban zoning is "*required*" to provide sufficient development capacity to meet expected demand for housing. The assessment of whether urban rezoning is "*required*" to provide sufficient development capacity involves examining whether there is already adequate feasible plan-enabled development capacity to meet demand.

The word "*required*" in clause 3.6(4)(a) imposes a high threshold. The rezoning must be necessary to provide sufficient development capacity, not merely desirable or convenient. Where, as here, the demand is predicated on residents choosing to relocate from an existing settlement, rather than on population growth or housing shortage, the rezoning cannot be said to be "*required*" to meet expected demand.

The voluntary nature of any potential move by Amberley Beach residents also undermines the strict "*required*" threshold. There is no "relocating community" until enough commit to relocation.

The demand assessment underlying PC7 is fundamentally flawed because it relies on the assumption that existing residents of Amberley Beach wish to relocate to the Proposed Site. That is an erroneous assumption; and a significant majority have signalled that they do not wish to relocate.

Clause 3.6(4)(b): Other Reasonably Practicable and Feasible Options Exist

There are other reasonably practicable and feasible options for providing the required development capacity (such that it exists). The Section 32 report and Economic Impact Assessment assert that there are no alternative options because the development capacity required relates to provision of a new distinct settlement area that must keep the Amberley Beach community together.

The requirement that the relocation site keep the Amberley Beach community together as a distinct settlement is a policy choice by Council, not a requirement imposed by the NPS-HPL or any other statutory instrument. Clause 3.6(4)(b) requires an assessment of whether there are other reasonably practicable and feasible options for providing the required development capacity, not whether there are other options that satisfy the Council's preferred relocation model.

Even accepting Council's criteria, the Economic Impact Assessment acknowledges that (a)(ii) other locations within that area (i.e. between Amberley Beach and Amberley Town) are also located on highly productive land. This suggests that alternative sites exist, albeit also on HPL. The fact that alternatives are also on HPL does not mean they are not "reasonably practicable and feasible options" within the meaning of clause 3.6(4)(b). Indeed, the Economic Impact Assessment notes that a large proportion is LUC 1 (to the north of the Proposed Site), making those sites potentially less suitable than the PC7 site, which is predominantly LUC 2. This comparison suggests that the PC7 site was selected not because it is the only option, but because it is preferable to other HPL sites.

The assessment of alternatives appears to have been limited to sites that would accommodate the entire relocation scheme (109 parcels plus 121 market lots). However, if the 121 market lots are not genuinely required to meet expected demand, then the required development capacity is significantly smaller, and a wider range of alternative sites may be reasonably practicable and feasible.

No consideration appears to have been given to non-HPL sites, either within the Hurunui District or in adjacent areas. While the Economic Impact Assessment states that the relocation site must be "*on the coastal side of Amberley in a place with easy access to Amberley Beach*", this is again a self-imposed constraint that unduly limits the range of alternatives.

The section 32 report states that maintaining a separate community and therefore the sense of identity for Amberley Beach requires a site that is separated from Amberley itself. However, there is a risk that Council have inaccurately conflated feedback indicating preferred proximity to the Amberley Beach and information reportedly received about residents *"not wanting to be part of the Amberley township"*. The driving time between the Proposed Site and the southern / eastern boundaries of the township is only approximately 4 minutes. The minimal driving time between the two locations reduces the legitimacy of the Proposed Site on the basis advanced by Council.

Even if all 109 lots from Amberley Beach relocated (which is highly unlikely) the majority of lots on the approximately 230-section Proposed Site would be for non-Amberley Beach residents. Given the proportionality of residents, whether fully utilised, or, only with a minimum take-up by Amberley Beach residents (as anticipated), the continuing character and identity requirements of the community on the Proposed Site described in PC7 cannot be satisfied.

The urban residential development of Amberley township has been significant in the last 20 years. That development has generally occurred in a tradition manner, where the existing town boundaries are expanded over time into immediately adjoining land. The land surrounding the Amberley township is not protected reserve land or land of a higher protection classification than LUC1. Further urban development in this area, some of which is situated only some 4 minutes' drive from the Proposed Site, is occurring and appears likely to continue in the future.

Planning policy (National Policy Statement for Highly Productive Land: Evaluation report under section 32 of the Resource Management Act) dictates that *"well-planned outward growth on the urban edge on HPL will generally be preferred over sporadic urban development on non-HPL away from urban centres with less cohesion, accessibility, diversity and so on."* This illustrates the fact that HPL classifications at the edge of the Amberley township are of a lesser consideration for 3.6(4)(b) than considerations concerning a new remote settlement.

Accordingly, the Council has not demonstrated that there are no other reasonably practicable and feasible options for providing the required development capacity, and clause 3.6(4)(b) is not satisfied. Creating a satellite town in a rural area makes no economic or practical sense when there is already sufficient development capacity within the expanding Amberley township.

Section 32 Assessment

The provisions in PC7 are not the most appropriate way to achieve the objectives of the proposal. Section 32(1)(b)(i) of the RMA requires the Council to identify *"other reasonably practicable options for achieving the objectives"* of the proposal. A staged or combined pathway, consistent with the Council's own adopted Coastal Adaptation Plan methodology, is, for example, a reasonably practicable option that has not been identified or evaluated.

The effectiveness and efficiency assessment is predicated on an incorrect understanding of demand from existing residents of Amberley Beach. In the absence of actual demand, the assessment of costs and benefits required under section 32(2) is flawed.

This flaw also affects the analysis of the risk of acting or not acting, if there is uncertain or insufficient information about the subject matter of the provisions, as required by section 32(2)(c).

Landscape Assessment

The Landscape assessment concedes that, for some neighbours, the change from rural to residential will be a "*fundamental change to the landscape*" and that "*parts of the site will still be visible, including rooflines and two-storey dwellings*" even after mitigation planting is established.

The mitigation proposed (peripheral planting and setbacks) is generic and not specifically tailored to the unique viewing angles, distances, or open field context of these neighbours.

Appendix D- The Landscape Assessment explicitly admits that the plan change will have "high adverse effects" on our rural character and visual amenity, which will remain severe for up to 10 years.

For us, as the owners of 165 Hursley Terrace Road, the details set out in Appendix D clearly illustrate the full extent of the visual effects that we will experience if this subdivision is approved and proceeds. This effect has been understated in the documentation and will have a severe impact on our lives.

5.2.5 Viewpoints 15 – 16: 165 Hursley Terrace Road

Descriptions of VP's

VP 15 and 16 are representative of views from **165 Hursley Terrace Road**. • VP 15 is located at the top of the eroded gully, adjacent to the shed on 165 Hursley Terrace road. Panoramas 15 and 15a are used to **demonstrate the full visible extent** of the proposed PC **from the boundary of the neighbouring property**. Pg 21

VP 16 is located at the easternmost edge of the terrace, at the northeast corner of the property, on the boundary of **165 Hursley Terrace Road**. Panorama 16 demonstrates the primary direction and focal point of the view from the dwelling, determined by the house, living areas and windows orientations. Panorama 16a represents the views south, perpendicular to the primary view towards the ocean. **Panorama 16a is orientated towards the Site and the proposed secondary access road**. Pg 22

The primary views from the dwelling are out towards the ocean and the change is proposed beside **165 Hursley Terrace Road** 'shoulder to shoulder', is in itself a mitigating factor. This, in combination with the proposed mitigation planting **reduces but does not negate the adverse effects experienced from VP 15, 15a and 16a**. pg 22

Overall, **the PC will have high adverse effects** on rural character and scenic amenity values currently experienced from **165 Hursley Terrace Road** (as represented by VP 15 and 16). The potential adverse landscape effects will reduce to moderate within 10 years once mitigation planting matures. Pg 22

Visual connection to the ocean

As the RMM landscape report states, the site has certain key attributes, including a "*visual connection to the ocean*". In this context, the visual connection to the ocean represents a defining

environmental quality and character attribute of the Amberley Beach community that PC7 seeks to preserve through the relocation to this site.

The claim that the land is being purchased to secure a sea view is both misleading and fundamentally flawed. Over the 20 years we have lived on the terrace, the outlook has changed considerably, particularly due to the rapid growth of *Pinus radiata*, which has at times significantly obstructed the view. This demonstrates that a sea view cannot be guaranteed or relied upon as a permanent or justifiable reason for purchasing the land.

There is no reason in the foreseeable future our farming operation as a livestock farm will cease to be viable and a forestry block be planted out as a carbon trading woodlot therefore negating the ocean view.

Appendix E: Preliminary Geotechnical Appraisal

Geotechnical and Hydrological Hazards

From our farming experience over twenty years on this land we know the land consists of topsoil over a clay pan, leading to poor winter drainage, constant natural springs, and visible cliff slips along the Dry Gully face and the Rosewood Terrace cliff face. Heavy housing infrastructure will severely exacerbate this instability.

The proposed 35 to 50-meter house setbacks from Hursley Terrace Road (HTR) are entirely insufficient due to ongoing leaching and terrace erosion witnessed over the last 20 years. An independent hydrology report is urgently required.

The Infrastructure and Servicing (water, sewer etc.)

The Infrastructure and Servicing Assessment contains several material deficiencies. Key concerns include:

- Insufficient certainty regarding sewerage infrastructure, particularly whether pumping will be required;
- Increased stormwater and rising water levels will flood Hurunui District Council's effluent pond paddocks, disrupting their Ecan consents;
- Incomplete confirmation of water supply capacity and routing;
- Introducing 238 residential lots with roofs and roads will exponentially increase surface water runoff into Dry Gully, worsening downstream flooding;
- Inadequate assessment of stormwater disposal constraints in relation to geotechnical hazards;
- Dry Gully is a major collection point for Amberley township's stormwater. It flows directly in front of our house and floods our eastern paddock during routine rain events. Major past floods (e.g., 2008) have overtopped Hursley Terrace Road and severely damaged our farming infrastructure;
- Incomplete traffic impact assessment, particularly regarding the State Highway 1/Hursley Terrace Road intersection
- Failure to confirm that required regional consents for stormwater discharge and earthworks are obtainable.

- Unlike Leithfield Township, this proposed subdivision provides zero amenities: no school, café, library, hotel or playground. It risks becoming an isolated “white elephant.”

Despite obligations under section 32 of the RMA, the Council is proceeding with PC7 with insufficient information.

The Infrastructure Assessment's reliance on future detailed design to resolve fundamental infrastructure questions is inconsistent with best practice for plan change applications and creates significant uncertainty about development feasibility and cost-neutrality.

Conditions Requiring public notification: Section 77D(a) RMA

Noting Council's public advice on 20 July 2026 that there will be no need to publicly notify later resource consent applications, in the context of the “novel” character of PC7 and the combination of the material adverse impacts referred to in this submission and other submissions in opposition, the preliminary nature of certain PC7 assessment reports, and the short 30 working-day submission period selected by Council for PC7, if PC7 is approved in any form, this submission seeks the imposition of conditions under s 77D(a) of the RMA in any plan change under PC7, requiring public notification for later resource consent applications and any other significant steps.

Section 77D RMA expressly empowers local authorities (commissioners in this case) to include rules in a plan specifying activities for which consent applications must be publicly notified.

Traffic

Traffic Reports: NZTA claims current traffic is 539 vehicles per day on Hursley Terrace Road.

In terms of exit (and entry) from the proposed site, the approximate distance by proposed road from the centre of the residential development to the Hursley Terrace Road exit/entry is 400m. From the same starting point, the approximate distance to the SH1 exit/entry is 970m. Travelling from the Proposed Site via Hursley Terrace Road to the more frequent east-side services of Amberley township (including supermarket, chemist, liquor, fast-food etc.) is an easy drive that avoids the SH1 speed, traffic and a requirement to cross SH1 twice. Distance, convenience, safety and economy will logically dictate significant use of Hursley Terrace Road from and to the proposed site.

Presently, fewer than 20 residents in 9 immediately adjoining homes currently have direct access from a house to Hursley Terrace Road. PC7 would fundamentally alter this character by enabling up to 238 residential lots, increasing the population with direct house access to Hursley Terrace Road to approximately 620 people (using the national average of 2.7 people per house) – i.e. an approximately 3,000% increase in direct road access, substantially increasing traffic volumes (including cars, SUVs, trucks, cycling, electric scooters, motorbikes and roadside walking) together with consequential environmental contaminants (including noise and light) in this quiet rural area. Adding 238 suburban lots (more than double the size of Amberley Beach) will easily push traffic over 1,000 VPD, as Hursley Terrace Road is the fastest route to Amberley amenities and avoids dangerous highway intersections.

A new residential area that is remote from Amberley, with no public transport, walking or cycling links, or amenities, raises concerns about accessibility and integration with transport and services. The lack of public and active transport options, and the absence of amenities, means PC7 does not provide for the broader diversity of needs expected in a well-functioning urban environment. As a remote settlement it does not meet the NPS-UD minimum requirements.

From a farming operation point of view, we farm both sides of Hursley Terrace Road. Currently, stock movements are managed by placing road cones and a "Stock Ahead" warning sign to alert approaching traffic. A person wearing a high-visibility vest is also stationed on the road to signal drivers to slow down or, when necessary, stop completely while stock is being moved. Despite these precautions, there have been occasions when drivers have failed to slow down or stop, even when traffic volumes have been relatively low. Fortunately, no people or livestock have been injured to date. However, with the significant increase in suburban traffic movements expected because of the proposed subdivision, safely managing stock movements will become increasingly challenging and possibly extremely dangerous and will present a greater risk to our farming operation.

It is inconsistent to the Hurunui District Council Plan Chapter 13 states:

(Indigenous Biodiversity) seeks to halt the decline of indigenous biodiversity and safeguard life-supporting capacity, yet PC7 proposes urban development that will permanently convert rural land and may adversely impact existing or potential indigenous vegetation and habitats through the introduction of intensive residential land use and associated infrastructure.

Newcombes Road and Kowai River Road

PC7 inadequately assesses and address material adverse effects on Newcombes Road and Kowai River Road, each situated below the proposed site and constituting faster beach and river-bed access routes from the Proposed site than via Amberley Beach Road.

These narrow shingle roads, which provide direct beach access and serve existing residents, are likely to be materially adversely impacted by the proposed 230 section residential development through: -

- Increased traffic volumes on roads not designed for higher residential traffic, potentially affecting safety and efficiency contrary to District Plan Policy 4.1;
- These roads now being the shortest route to the beach for the residents.
- Road/beach parking maintenance and upgrade costs that have not been adequately assessed.

The omission or inadequate treatment of the effects in PC7 documentation constitutes a material deficiency in the evaluation.

Cost Neutral

Financial Burden on Ratepayers: The Economic Impact Assessment notes the project will not be cost-neutral until 2055 (after selling 120–150 sections). Hurunui ratepayers will be forced to fund and manage this massive debt for decades. Ratepayers unfairly bear all the risk of error and

achieving cost-neutral is subject to a wide set of assumptions and risks that make this financial outcome uncertain.

TVNZ 1 spoke with Deon Swiggs, Chair of Environment Canterbury, on 11 August 2026. He stated that, in Canterbury, “a council has already bought land for a coastal community to move to, and that cost has been borne by those ratepayers,” adding that, while it is a small community, the cost is substantial. Deon Swiggs suggested that the Climate Change Commission’s 2026 report on how New Zealand is tracking on climate adaptation highlights the need for a clear framework, together with funding mechanisms to support communities facing these challenges. Importantly, however, the report’s recommendations are directed primarily towards central government, highlighting the need for national leadership, guidance and financial support in responding to climate-related relocation and adaptation.

This raises questions about the approach being taken by Hurunui District Council (HDC). As David Hill reported in *The Press* on 9 July 2026, a North Canterbury council was looking to progress “a uniquely Hurunui solution” to sea-level rise, with Chief Executive Mr Dobbie describing the approach as “novel.” While a locally driven solution may ultimately prove valuable, it could be argued that HDC has moved too quickly in attempting to develop its own approach, particularly given the significant financial and social implications of managed retreat and climate adaptation. Rather than proceeding ahead of a nationally established framework, it may have been more prudent to await clearer direction, guidance and expertise from central government and the Climate Change Commission.

The comments from Deon Swiggs reinforce the importance of having a consistent national framework and appropriate funding arrangements before individual councils and their ratepayers are required to shoulder the potentially substantial costs of climate adaptation on their own.

Concerns that have not been addressed

- legal costs associated with litigation and stapled-title enforcement with Amberley Beach residents;
- costings for landscape and mitigation planting and for years of plant maintenance (expected to be a substantial initial and ongoing cost for Council),
- house and vehicle relocation risk (e.g. house buses and unused vehicles) to the marketing and market value of the residential development; and
- out-of-market residential land covenants to cater for Amberley Beach relocation components, such as permitting caravans and tiny homes.
- costs associated with public transport, walking or cycling links, existing roading upgrades, and amenities.
- Significant roading upgrades and changes to SH1 entrances from the site and from Hursley Terrace Road including land purchases.
- The risk that 121 lots for sale on the open market is not sufficient for cost-neutral, noting that the Council’s estimate of this number required increased by one-third (33%) between 2023 and PC7. The Economic Assessment Report models 250.

- Releasing the remaining publicly owned sections at prices that we believe are significantly lower than market value of comparable lots in terms of size, location, and outlook, has the potential to adversely affect the value of our property. It may also attract a different buyer demographic than originally anticipated, which could, over time, influence the character, cohesion, and amenity of the neighbourhood.

Development and Construction period

Section 32 of the Resource Management Act 1991 requires that the evaluation report for a plan change must examine whether the provisions are the most appropriate way to achieve the objectives by identifying and assessing the benefits and costs of the anticipated effects and must contain a level of detail that corresponds to the scale and significance of those effects.

PC7 represents a "novel" proposal of material scale and significance. Council has confirmed that public notification of later resource consent applications for the residential development by Council may not occur. Submissions would therefore not be possible at that point.

Noting the points above, the PC7 reports do not contain specific analysis of construction-phase impacts such as noise, dust, traffic, visual disruption, or the temporal sequencing of building activities. The construction phase represents a significant period of physical activity that will have effects distinct from the completed development. The PC7 reports acknowledge the time uncertainty and lot and infrastructure development, to house-build over 230 lots, may take up more than a decade.

As direct neighbours, we will be significantly affected by the sustained daily noise associated with the construction phase. It will severely disrupt our lives, our farming operation and make livestock management more difficult and potentially hazardous. For most of the year, we graze sheep only on the paddock neighbouring Dry Gully. For approximately six months of the year, this also includes ewes with lambs, and our pet paddock for orphan lambs runs alongside the boundary fence with Dry Gully. These lambs can be flighty and are easily unsettled by outside disturbances. Of major concern are stray dogs, dogs off lead, and people shouting, all of which have the potential to cause significant disruption to our farming operation and compromise the welfare of our livestock. The cumulative effects of prolonged noise, increased traffic, and ongoing disruption will have a significant adverse impact on our mental health, overall well-being and farm production.

The absence of construction-phase analysis for PC7 is significant and represents a gap in the assessment of environmental effects.

Adverse effects

The section 32 assessment is flawed. The PC7 is not the most appropriate way to achieve the purpose of the Resource Management Act 1991 (**RMA**).

Paragraph 55 of the section 32 report for PC7 provides an illustration a flaw in that report when assessing the scale and significance of anticipated PC7 effects as "*low-moderate*", based on the reasoning that "*the changes affect a single area, and will have a limited effect on the wider community*". Section 32 of the RMA requires assessment of environmental, economic, social, and

cultural effects that is holistic and not strictly confined to geographic proximity, reflecting broader considerations of how policies or plans impact various social, economic, and cultural dimensions across potentially affected communities. The section 32 assessment tries to improperly prioritise a narrow geographic footprint over the multi-dimensional effects assessment required. A concentration of severe adverse effects within the Hursley Terrace Environment does not make those effects acceptable under the RMA or otherwise.

The New Zealand Coastal Policy Statement (NZCPS)

PC7 fails to give effect to the Canterbury Regional Policy Statement (CRPS)

Regional and district plans must "give effect to" the NZCPS. The coastal environment is one of the environments of special concern in the district. The District Plan records that the coast is one of the district's most significant natural resources and that —coastal environment" can generally be regarded as the areas in which the coast is a significant part or element.

The NZCPS applies to areas within the "coastal environment," which extends beyond the coastal marine area defined by the Resource Management Act 1991. The importance of a "visual connection to the ocean" is emphasised by PC7. The term "coastal environment" is intentionally broad and includes land where the coast is a significant element. According to both statutory provisions and case law, the extent of the coastal environment can vary based on local characteristics. The impact of PC7 and the resulting significant increase in residents and traffic movements in and around the coastal environment

Conclusion & Personal Impact

Over the past 20 years of farming at 165 Hursley Terrace Road, we have cooperated fully with the Hurunui District Council (HDC), despite the disruption that council works have caused to our farming operation.

These works have included the installation of a well, two sewer pipelines, (one from Hursley Terrace Road and one from Amberley Beach Road) and two water pipelines. Most recently, in 2025, we agreed to allow HDC to install new water pipes inside our boundary fence which goes the entire length of our farm from Newcombes Road to Beach Road. This curtesy saved the Council a considerable amount in traffic management costs along Hursley Terrace Road.

This project was carried out over several months, with delays due to weather and staff being reassigned to other work. During this time, there was significant disruption to our farming operation and the temporary loss of paddocks, as sections of our boundary fence along Hursley Terrace Road were removed and no temporary roadside fencing was installed. We also continue to accommodate HDC staff who regularly access our property to monitor the well.

Throughout all these projects, we have accepted the disruption and consistently acted in good faith, showing cooperation and goodwill towards HDC staff.

Against this background, the way this property was purchased—without any prior discussion or opportunity for us to raise our concerns—has left us feeling extremely disappointed and let down by HDC. We believe that an open discussion beforehand could have helped the Council better understand our position and the potential implications before proceeding with what we consider

to be a significant and high-risk decision. In this, HDC is not the partner for us that we have solidly been for HDC.

We still fail to understand why HDC would consider purchasing a farm when it appears to have little understanding of the complexities and responsibilities that farm ownership entails. More importantly, why purchase 86 hectares when only 34 hectares are required for the proposed relocation? This approach places all Hurunui ratepayers at unnecessary financial risk.

Our family represents the third generation to farm in this district since 1955. We see ourselves as custodians of this land, with a responsibility to care for it and pass it on to future generations. We are passionate farmers and are committed to teaching our children and grandchildren about the importance of farming the land sustainably and responsibly, so that it can continue to provide long term food security. Throughout our lifetime, we have witnessed the loss of significant areas of valuable, productive farmland to subdivision and urban sprawl. We believe this is a concerning trend that needs to be carefully considered when decisions are made about the future use of our rural land.

This proposed plan change poses a direct threat to our farming business, our livelihood, our way of life, and our mental wellbeing. Given the significant uncertainties surrounding the proposal and the potentially severe adverse impacts, we believe this plan change is inappropriate and should be declined.

5. I seek the following decision from the consent authority:

Please give precise details, including the general nature of any conditions sought.

I request that the Hearings Panel:

1. **Decline Plan Change 7 in full**, retaining the Rural Zone over the site.
2. **Require Council to reassess relocation options** using updated, evidence-based climate hazard modelling.
3. **Protect highly productive rural land** from unnecessary rezoning.
4. **Avoid reverse-sensitivity conflicts** by keeping residential development within existing urban zones or areas already identified for growth.
5. **Ensure future planning decisions align with District Plan objectives** for rural land protection and sustainable development.

Plan Change 7 is not justified, not aligned with the District Plan, and not supported by robust evidence. It would permanently remove highly productive rural land, create significant reverse-sensitivity issues for neighbouring landowners, and introduce urban development into an area not suited for it. For these reasons, I strongly oppose PC7 and request that it be declined.

6. Hearing:

I wish to be heard in support of my submission: YES ☒ NO ☐

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☒ NO ☐

Notes:

- The closing date for serving submissions on the consent authority is the 20th working day after the date on which notification is given **(5pm Friday 21 August 2026)**.
- If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
- Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

The Mayor and Councillors
The Chief Executive Officer
 Hurunui District Council
 66 Carters Road
 Amberley
 North Canterbury

8 June 2026

OPEN CORRESPONDENCE

Dear Mayor, Councillors, CEO,

ROSEWOOD: LAND USE CHANGE AND RESIDENTIAL DEVELOPMENT

Following consideration of the initial public consultation and plans issued by Council, the signatories to this letter write to convey their view in relation to this proposed land use change and residential development.

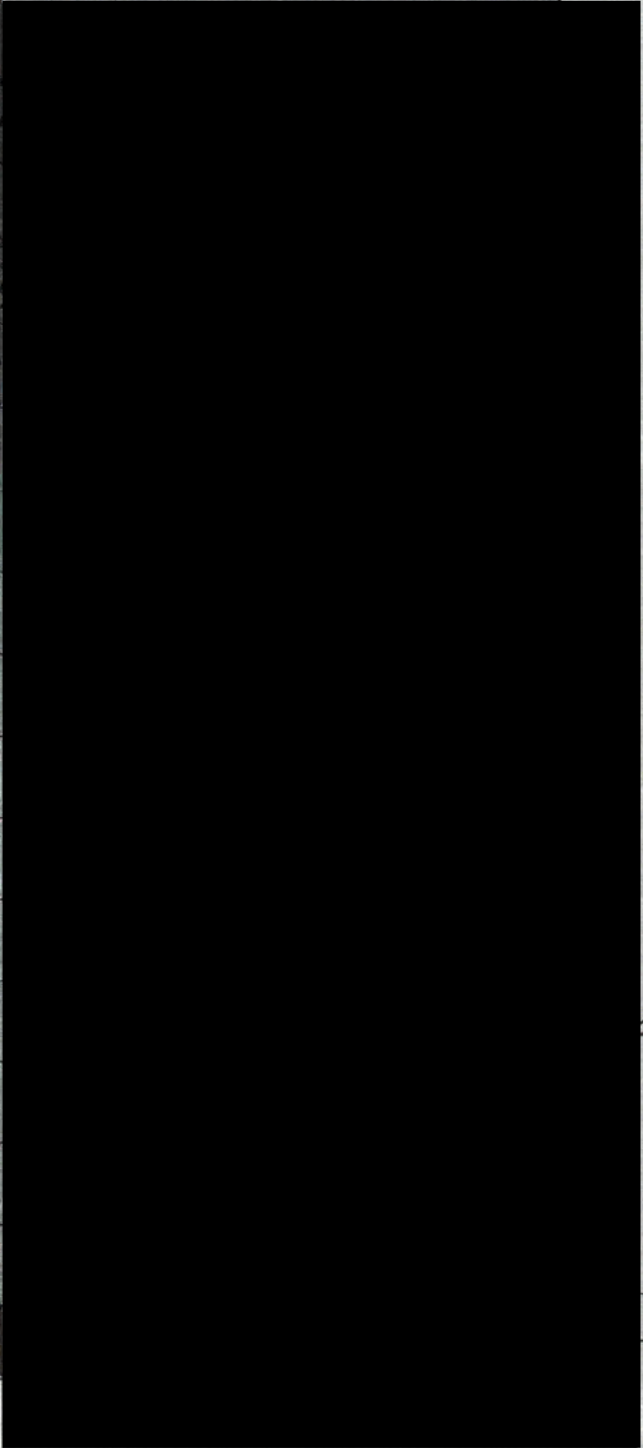
The signatories to this letter OPPOSE the proposed land use change and residential development at the Council owned property known as Rosewood.

- This letter provides early certainty for decision-makers at Council in respect of community approval or opposition.
- The signatories to this letter represent the ratepayers and property owners located proximate to the proposed Rosewood site. It does not seek to communicate by way of a large volume of signatories.
- This letter does not seek to outline reasons for the view conveyed. It is understood that this opportunity will arise at later moments, if the proposal proceeds.
- The absence of any signatory does not suggest a contrary view.

Yours faithfully,

List of signatories at Appendix 1

Appendix 1

Name	Address
Rose Hinton <i>RHinton</i>	
<i>Michael T. H.</i>	
<i>Cat</i> Campbell Munro	
Johnny Nadin <i>JNadin</i>	
Nikki Newin <i>NNewin</i>	
Mitch Cochrane <i>MCochrane</i>	
Laura Fairbrass <i>LFairbrass</i>	
Vicki Sanford <i>VSanford</i>	
Dave Sanford <i>DSanford</i>	
Debbie Ducker <i>DDucker</i>	
Shaun Ducker	
HARRY + BILL TURNBULL <i>HTurnbull</i>	
GRANT CHAPMAN	
Tracey Chapman	
Wayne Chisnall <i>WChisnall</i>	
Jenny & Lucretia D. Chisnall	
Celes Comeack	

Appendix 1

Name	Address
Robin Gornack	
Julian Gornack	
Alan Wilkinson	
Trevor Brown	
Chissa Taylor	
Matt Dixon	
Robyn Ford	
Mike Cox	
George & Laura Ford	

Appendix 2

Map of signatory properties



Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Grant and Sharon Benns

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

Upload any supporting documents here:

SUBMISSION AMBERLEY BEACH 2026 11111.docx

18.29KB

Do you wish to be heard in support of your submission? *

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter

Address: *

Street Address

20 Grierson Avenue

Address Line 2

Amberley Beach

City

Amberley

Postal / Zip Code

7481

State / Province / Region

North Canterbury

Country

New Zealand

Phone number:

277,801,396

Email: *

francesbenns@hotmail.co.nz

Contact person:

Name and designation if applicable

Note to submitter:

The closing date for serving submissions on the consent authority is the 20th working day after the date which notification is given (**5pm Friday 21 August 2026**).

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

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If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

I strongly oppose relocating Amberley Beach residents to Rosewood Terrace.

Based on council meetings, I understood relocation would be considered only after one or more major emergency events within 30 years.

At the time, this seemed sensible and proactive.

It now appears residents were not given the full picture, especially given the unexpected purchase of the Rosewood Terrace land.

Residents were then invited to view it.

I found the site unsuitable because it is farmland surrounded by other farms and is far from the beach environment residents chose.

I understand council wants to plan ahead.

However, too much seems to have been overlooked while planning for climate-change impacts that remain uncertain in timing and scale.

In 16 years at the beach, we have seen only one king tide, which caused minor erosion to the gravel bund near the golf course.

When residents were asked to fund another bund through rates, I questioned why council would repeat an approach that had already failed.

Little cost information was provided. If residents must pay, they deserve a clear breakdown.

Instead, invest in a properly repaired, strengthened bund that protects Amberley Beach.

Rather than relocating the community, council should first consider practical ways to protect and improve Amberley Beach.

St Clair Beach in Dunedin shows that well-designed coastal protection can work, and there are other successful examples council could learn from.

There are several successful examples.

Amberley Beach could be strengthened as a community asset by attracting weekend visitors and summer campers while generating revenue for ongoing improvements.

Upgrade the campground with better facilities, including new ablution blocks and showers, and charge reasonable fees to generate revenue.

Improve children's play areas and add a pool.

Improve the lagoon walkway, which is already a lovely place to walk.

Add a general store with tearooms for campers.

Offer more activities beyond the annual fishing competition.

Involve Amberley township businesses.

These improvements would help Amberley Beach become more resilient, more useful to the wider district, and more financially sustainable. A strong community that supports its council will make Amberley an even better place to live. Work with farmers and residents to build strong relationships.

Beyond the beach's potential, the community matters: many residents chose Amberley Beach for personal reasons and have made it home.

It offers peace, tranquility, safety, and nature.

Native birds, dolphins, seals, and the freedom to walk by the sea are minutes from our door.

Neighbors look out for each other and readily help.

Places like this are rare; we love it and call it home.

Relocation would place a major financial burden on households, forcing people to move beloved homes and clear sections miles from the beach.

If I wanted to live in a subdivision of 100-plus homes, I would not have moved to the beach.

Unless you have lived here for years, you may not understand that Amberley Beach is our slice of paradise.

Why should residents lose the community and lifestyle they have built in the name of progress?

I hope there is another way: a compromise that benefits both council and residents.

Residents should be able to choose where they live, settle, and enjoy their later years without fearing forced relocation.

How would you feel if, after working most of your adult life to own your home, someone told you to leave and accept their plan?

While council may say residents are not being forced, its control over rates, valuations, and services gives it significant influence over residents' choices.

Invest in Amberley Beach. Let residents stay, build proper coastal protection, and restore the community's voice. Residents would support fundraising or revenue initiatives that help protect this place.

Amberley Beach is special, and overlooking its potential would be a serious mistake.

Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Darren Reed & Sheryl Smith

This is a submission on the following change proposed to the Hurunui District Plan:

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property **185 Ashworths Road, Amberley** from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

Change proposal Clause 6 of Schedule 1 of RMA 1991

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views. You can upload supporting documents below.

We oppose the specific provisions around rezoning and relocation of Amberley Beach settlement.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

To not allow rezoning of 185 Ashworths Road, Amberley.

We do not believe the Hurunui District Council should be involved in the business of property development.

Upload any supporting documents here:

Do you wish to be heard in support of your submission? *

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter

Address: *

Street Address

40 Grierson Avenue

Address Line 2

Amberley Beach

City

Amberley

State / Province / Region

Canterbury

Postal / Zip Code

7481

Country

New Zealand

Phone number:

21,725,127

Email: *

Office@reedpg.co.nz

Contact person:

Name and designation if applicable

Sheryl Smith

Darren Reed

Note to submitter:

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If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

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If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

Form 5 - Submission on notified plan change proposal



Clause 6 of Schedule 1 of the Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Name of submitter: *

Giles Gormack

This is a submission on the following change proposed to the Hurunui District Plan:

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The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

Trade Competition: *

Could you gain an advantage in trade competition in making this submission?

No

The specific provisions of the proposal that my submission relates to are:

Please provide the rule number.

I oppose all provisions that:

- rezone rural land to residential 1 zone
- enable subdivision of approximately 230 sections
- weaken rural zoning protections
- the council becoming a property developer using ratepayer funds

My submission is:

Include whether you support, oppose or are neutral to the specific provisions or wish to have them amended and the reasons for your views.
You can upload supporting documents below.

i oppose the plan change 7 in its entirety

The reasons are as follows:

- the loss of highly productive rural land which contradicts the Hurunui district councils plan to protect rural land for productive use. Expansion of Amberley should adjoin the township rather than a random subdivision in the middle of rural land.

- This subdivision is not deemed necessary. There is no immediate danger, if at all to Amberley Beach.

- In future does the council intend to develop the rest of the property (approx 52 ha)

-The effects on existing rural landowners, The placing of approximately 230 homes in a rural area will cause complaints of noise, smell, dust and heavy machinery which are part of every day rural production.

-Traffic. I have lived in Crosses Road for 32 years (adjacent to the land to be subdivided). If the traffic is to double along Hursley Tce, the road is not up to standard. The intersections of Hursley Tce and Crosses Road with State Highway 1 at present are barely adequate. With a huge increase in traffic they will be dangerous. Having witnessed many collisions on these intersections i can see a lot of work will need to be done. The Hursley Tce intersection is adjacent to the Kowai River bridge which is already an accident hotspot that has been under review for years with no action taken. Several years ago the shingle trucks were stopped from using Hursley Tce to access the quarries due to safety and road standards. Due to the distance to amenities in Amberley means more road travel

- Commercial Impacts. Does the council have a conflict of interests by being the developer and the council to oversee the development. They are using ratepayers money and do they have commercial pressure to approve the plan to move forward

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

I request that the authority DECLINE the Plan Change 7 in full and retain the rural zone hereby protect highly productive rural land.

That the council follow their own District Plan for rural land and protect productive land

Upload any supporting documents here:**Do you wish to be heard in support of your submission? ***

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing:

Yes

Contact details for submitter**Address: ***

Street Address

10 Crosses Road

Address Line 2

RD1

City

Amberley

Postal / Zip Code

7481

State / Province / Region

canterbury

Country

New Zealand

Phone number:

Email: *

gilesgormack@gmail.com

Contact person:

Name and designation if applicable

Giles Gormack

Note to submitter:

The closing date for serving submissions on the consent authority is the 20th working day after the date which notification is given (**5pm Friday 21 August 2026**).

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the Council is satisfied that at least one of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

19 AUG 2026

RV:



HURUNUI DISTRICT COUNCIL FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

Please do not hesitate to phone or email the planning team at the Hurunui District Council (ph 03 314 8816; email planning@hurunui.govt.nz) if you require any assistance.

To: Hurunui District Council

Date: 19/08/2026

This is a submission on the following change proposed to the Hurunui District Plan:

This is a submission on the following change proposed to the Hurunui District Plan:

Plan Change 7 – Rosewood Terrace

The Council has initiated a plan change to the Hurunui District Plan to rezone part of the property 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone, and apply an Outline Development Zone overlay along with associated changes to the policies and rules applying to the plan change site. The rezoning would enable development of approximately 230 residential lots.

The purpose of the plan change is to allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards (including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater) in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment.

1. Submitter details:

Name/s: (Full name)

MIRIAM LUCY BARTLETT

Contact person:

Designation:

Address for service:

16 HOLTON ROAD
AMBERLEY BEACH.

Email address:

lucylighthomework@gmail.com

Telephone:

021-0690285

2. For the purposes of section 308B of the Resource Management Act 1991:

☐

I am a trade competitor, and I am ☐ or I am not ☒ directly affected by an effect of the subject matter of the submission that:

(a) Adversely affects the environment; and

(b) Does not relate to trade competition or the effects of trade competition.



I am not a trade competitor

3. The specific provisions of the proposal that my submission relates to are:

ALL.

4. My submission is in ☐ support ☒ opposition (tick applicable)

Include whether you support, oppose or are neutral to specific parts of the application or wish to have them amended and provide reasons for your views. This may be provided on a separate sheet if you need more space.

See attached (2 pages)

5. I seek the following decision from the consent authority:

Please give precise details, including the general nature of any conditions sought.

See attached (2 pages) - same as for Item 4.

6. Hearing:

I wish to be heard in support of my submission: YES ☐ NO ☒

If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES ☒ NO ☐

Notes:

- The closing date for serving submissions on the consent authority is the 20th working day after the date on which notification is given **(5pm Friday 7 August 2026)**.
- If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
- Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:
 - it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

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If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

Attachment for Item 4:

I oppose the Plan change 7 on the grounds of:

- Using up productive fertile land for housing
- The unmanageable cost to residents to relocate to Rosewood
- The effects of the suggested relocation on the mental health and well-being of the Amberley Beach Community and on a currently cohesive community.
- The haste with which the decision will be made and the fish hooks there will likely be in the plan that a resident may not fully comprehend given the number and complexity of documents they must read through in order to make a safe decision about their future.
- Potential unknown consequences of (a) merging of regional councils (b) a possible change of government this year and (c) the process of managed retreat these authorities will pursue after these changes make it a volatile time to be making plans..
- Despite the Council stating the managed retreat plan will be "cost neutral", it will not be "cost neutral" to the residents of Amberley Beach.
- The information on which the CAP (Coastal Adaptation Plan) was based was a worst case scenario, whereas now the effects of climate change have been predicted to be not so severe by the scientists. So in effect, the goalposts have changed.

Elaborating on the above, I moved to my house in Amberley Beach this year (2026) after retiring, having a longheld wish to retire to this small coastal settlement with all the benefits it has, sea air, small community feel, uncrowded. I have owned the house since 2003. In my engagement with the community I have found that most residents do not want to move, and that there are many elderly people living here who are long term residents with a good quality of life who intend to live here for the rest of their lives. I feel that I cannot proceed with any improvements to my property to assist with ageing well, until the plans for residents here are finalised. The plan as proposed has produced much disquiet and some fractiousness among the beach residents.

In the time I have owned my house, there has been no inundation to my property. I am grateful for the bund being renourished, although the 20 year lifespan of the last renourishment or revetement has proven to have degraded before then, possibly because the methods and materials used did not create a solid enough bund.

The costs of relocating, even with a subsidised section price, are substantial, and I, like many others, would not be able to afford the substantial extra costs of: clearing my section at Amberley Beach, building a house at Rosewood, connecting services on the section, moving costs etc., plus the mental stress of moving.

Though nothing is certain in life, climate change is affecting coastal communities, and councils are instructed by central government to take on the burden of planning changes for their residents, but the whole process regarding Plan Change 7 seems rather swift, is unsettling, costly, and probably based on worst case scenario climate change.

Submission on Hurunui District Council Plan Change 7 - Rosewood Terrace

The aim for Amberley Beach residents is still the same as per "Coastal Conversations" (issued by HDC in 2020):
to (...ensure houses are kept free from water and remain insurable and serviceable"
and "retain the small town community feel(s) whereby residents can feel safe and close to the natural environment:"



Lucy Bartlett
16 Holton Road

19/8/2026