

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)

Roseanne Hinton & Michael Tayles

Contact person: Roseanne

Designation: Affected land owner

Address for service:

70 Newcombes Road,
AmberleyEmail address:
rose_hinton@hotmail.com

Telephone: 021 0852 8434

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:

We oppose Plan change 7 in its entirety.

Our reasons of opposition are set out below

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.

My Position

We strongly oppose Plan Change 7 and request that Hurunui District Council decline the proposed rezoning and development.

Our family moved to our rural property because we wanted to raise our children in a quiet, productive rural environment. We chose this location specifically because of its open space, farming character, low-density living, native wildlife, and rural lifestyle values.

The proposed development would fundamentally change the character of our community and impose significant environmental, traffic, infrastructure, safety and amenity effects on existing residents who have had little meaningful consultation throughout the process.

We do not believe the effects on Hursley Terrace, Newcombes Road, neighbouring farms, lifestyle properties, rural businesses and the wider community have been adequately assessed and we're not satisfied that all reasonable alternative locations have been properly considered

1. Permanent Loss of Highly Productive Rural Land

Plan Change 7 would permanently remove approximately 37 hectares of highly productive LUC 1 and LUC 2 rural land from primary production. Once this land is rezoned, subdivided and developed, it will be permanently lost as a productive agricultural resource.

I am not satisfied that Council has demonstrated why this particular site is necessary when lower-productivity land, existing residentially zoned land or other alternative locations may be available. The convenience of the site alone is not sufficient justification for permanently urbanising highly productive rural land.

2. Alternative Locations Have Not Been Adequately Assessed

One of our main concerns is whether all reasonably practicable and feasible alternatives have genuinely been considered.

The rationale for Rosewood appears to rely heavily on keeping the Amberley Beach community together and locating the development close to the coast. While these considerations may be relevant, they may have artificially narrowed the range of locations considered before alternatives were properly assessed.

Before permanently urbanising highly productive land, Council should clearly demonstrate that all reasonable alternatives, including lower-productivity land and alternative development options, have been thoroughly investigated and exhausted.

The fundamental question is not simply whether houses can be built at Rosewood. It is whether Rosewood is the most appropriate location for those houses.

3. Questions Around the Managed Retreat Justification

We understand that the primary justification for PC7 is to provide a managed retreat option for the Amberley Beach community due to coastal hazard risks.

However, statements made during Council discussions appear to suggest that the development could remain financially viable even if relatively few Amberley Beach residents ultimately relocate.

This raises an important question:

If the development would proceed regardless of whether the intended relocation occurs, is the permanent loss of highly productive land genuinely necessary to achieve the stated managed-retreat objective?

We believe this question should be clearly answered before any rezoning decision is made.

4. Reverse Sensitivity Effects Have Been Underestimated

Rosewood would create a large residential settlement surrounded by established farms and rural properties.

Existing farming activities include:

- Livestock movements
- Working dogs
- Irrigation
- Machinery operation

- Spraying
- Tree felling
- Dust generation
- Rural lighting
- Agricultural odours
- Seasonal and early-morning farming activities

These are all lawful and entirely normal rural activities.

The concern is that approximately 230 new households may introduce suburban expectations regarding noise, lighting, amenity and rural activities.

Over time, complaints from residents can create pressure on neighbouring farmers to alter lawful farming practices, resulting in additional costs, restrictions and reduced productivity.

Existing farmers should not be expected to change legitimate farming practices to accommodate a residential development deliberately introduced into an established productive rural environment.

5. Traffic and Road Safety Have Not Been Adequately Assessed

The surrounding road network was designed for rural use, not for a subdivision of approximately 230 homes and more than 600 residents.

Hursley Terrace:

- Is narrow
- Has unsealed shoulders
- Has limited visibility
- Contains blind bends
- Carries quarry traffic and heavy vehicles
- Has no dedicated cycling or pedestrian facilities

We're concerned that the traffic modelling underestimates how many residents will use Hursley Terrace because it provides the most convenient route into Amberley.

The assessment also appears to underestimate:

- Construction traffic
- Visitor traffic
- Trade and service vehicles
- Cyclists
- Pedestrians
- Farm machinery
- Stock movements

The proposal could increase the number of residents with direct access to Hursley Terrace from fewer than 20 residents to approximately 620 people, fundamentally altering the character and function of the road.

Independent safety assessments should be undertaken for:

- Beach Road / Hursley Terrace (right hand turn) we've had very close call experiences with trucks flying down the hill to the quarry and with no passing space I was forced onto the wrong side of the road. Increased right hand turning traffic will exacerbate this danger.
- Newcombes Road / Hursley Terrace (Right hand turn) There is not 200m clear sight for vehicles turning out of Newcombes road, the increased traffic poses a huge threat to crashes. We have near misses nearly daily.
- Hursley Terrace generally
- Newcombes Road
- Crosses Road
- Right hand turn from SH1 to Hursley Terrace – We use this harrowing turn daily. It needs to be properly engineered to facilitate the increased traffic. NZTA claims of 15% increase is incorrect and common-sense should override this. We all know it is the most convenient route and will be used as such. Ignoring this hazard **will** put lives at risk.

6. Newcombes Road Must Not Become Beach Access

This is one of our strongest concerns.

These residents have traditionally lived at the beach and enjoyed walking and recreating there. Newcombes Road is the closest access point from the proposed development. It is therefore entirely foreseeable that residents of Rosewood will seek to use Newcombes Road to access the beach.

Newcombes Road is:

- A narrow, high-speed rural road
- Predominantly unsealed
- Used by approximately six households
- Used for farming activities
- Used for livestock movements
- Used by heavy vehicles
- Used for wastewater treatment operations

It has:

- No formal beach access infrastructure
- No parking
- No turning facilities
- No pedestrian facilities
- No cycling facilities

The paper road leading toward the beach is not maintained by council but by local residents. Furthermore, the actual access to the beach passes through private property at 110 Newcombes Road. Vehicles already regularly become stuck and require assistance from us local residents using tractors to remove them.

This places an unreasonable burden on the residents and private landowners who currently facilitate and maintain access.

Because Rosewood is being promoted as a relocation option for Amberley Beach residents, it is entirely foreseeable that Newcombes Road could become the beach access route for the subdivision.

This would create conflicts between:

- Pedestrians
- Cyclists
- Dogs
- Recreational users
- Farm vehicles
- Livestock
- Heavy vehicles
- 110 Newcombes Road Private property

Newcombes Road is a rural working road, not a beach access road.

If beach access forms part of the development's amenity, it should be purpose-designed, fully funded and maintained by the development. Existing Newcombes Road residents should not be expected to provide the access infrastructure for a 230 home 'managed beach retreat'. Nor should we be expected to absorb the resulting safety, traffic, parking and maintenance problems.

7. Stormwater and Flooding Risks Remain Unresolved

We have firsthand experience of flooding in this area.

The surrounding land already experiences flooding and drainage issues. Residents have raised concerns regarding blocked drains, fallen trees and inadequate maintenance for many years.

The development would introduce large areas of impermeable surfaces including:

- Roads
- Roofs
- Driveways
- Footpaths

This will inevitably change how stormwater moves through the landscape.

Council should provide independent hydrological modelling demonstrating that downstream residents, roads and productive farmland will not experience increased flooding risks.

The development must not solve a stormwater problem for the new subdivision by creating or worsening one for existing rural residents.

8. Native Wildlife, Livestock and Domestic Animals

The area supports significant native biodiversity including native birds and lizards.

Construction activities, earthworks and urbanisation have the potential to damage habitat, displace wildlife and reduce biodiversity values.

The development will also introduce potentially hundreds of domestic cats and dogs.

Concerns include:

- Predation of native birds
- Predation of lizards
- Habitat disturbance
- Risks to poultry
- Risks to livestock
- Dog attacks and stock worrying
- Biosecurity concerns

We are deeply concerned that wildlife currently present in the area may be displaced during construction and then face ongoing predation pressure from domestic animals once the subdivision is established.

Strong animal management controls, ecological assessment and secure containment measures should be required. Including high fences around the entire subdivision.

9. Permanent Loss of Rural Character and Amenity

The proposal would permanently transform the character of the surrounding rural environment.

The development would introduce:

- Approximately 230 homes
- Street lighting
- Security lighting
- Increased traffic
- Additional noise
- Pedestrian activity
- Cycling activity
- Construction activity
- Domestic animals
- Urban infrastructure

These effects extend far beyond the development boundary and will alter the wider Hursley Terrace and Newcombes Road environment.

Light Pollution

The area currently benefits from genuinely dark rural skies and very limited artificial lighting.

The introduction of hundreds of homes, streetlights, security lights and vehicle headlights will create urban glow and permanently alter the rural night environment.

This may affect:

- Rural amenity values
- Dark sky visibility
- Livestock behaviour
- Wildlife movement

- Neighbouring residents

Once introduced, these effects cannot realistically be reversed.

10. Social Infrastructure and Cumulative Growth

We are deeply concerned about the lack of demonstrated planning for the social and physical infrastructure required to support the scale of growth occurring and proposed in Amberley.

Amberley experienced 21.7% population growth between 2018 and 2023. This figure does not include the significant additional growth now proposed or underway. The Clearing is in its early stages with 123 homes initially proposed and up to 400 planned, Amberley Country Estate proposes approximately 250 homes, and Totara a further 42 homes. Rosewood therefore cannot be considered in isolation; it forms part of a much broader and substantial expansion of Amberley.

My concern is that the infrastructure required to support this growth is simply not currently in place, and I have not seen a clear, comprehensive plan demonstrating how it will be provided.

Our medical centre, schools and emergency services are already under significant pressure. Hundreds of additional households will inevitably increase demand. The question is not simply whether we can physically build more houses, but whether Amberley has the capacity and infrastructure to properly support the people who will live in them.

I am equally concerned about our water supply and wastewater infrastructure, which is already ageing and under significant pressure. How can these existing systems sustainably accommodate the scale and intensity of growth proposed across Amberley without substantial investment and expansion?

This raises a fundamental question: **where is the comprehensive infrastructure plan for this cumulative growth?**

How will our water and wastewater systems cope with hundreds of additional homes? How will our medical services, schools and emergency services accommodate the additional population? What additional capacity is being planned, who is responsible for providing it, and when will it be delivered?

The cumulative impact of these developments must be considered, rather than assessing Rosewood in isolation. Amberley has already experienced significant population growth, with potentially hundreds more homes planned across multiple developments. This represents a major and rapid expansion of our community.

Growth must be matched by corresponding and clearly demonstrated investment in essential infrastructure and services. Without that planning, there is a very real risk that our existing community, services and infrastructure will be expected to absorb growth beyond their capacity.

For these reasons, I consider the lack of demonstrated planning for the cumulative impact on Amberley's social, water and wastewater infrastructure to be a significant concern

11. Construction Impacts Have Not Been Adequately Assessed

The construction phase could extend for many years and may last a decade or longer.

Construction effects include:

- Heavy vehicle movements
- Dust
- Noise

- Vibration
- Lighting effects
- Earthworks
- Wildlife disturbance
- Livestock disturbance
- Ongoing disruption to residents

These effects should not simply be deferred to future resource consent processes.

The likely effects of the construction phase should be clearly assessed before rezoning occurs.

Overall Conclusion

We understand and support the need to find long-term solutions for communities affected by coastal hazards.

However, managed retreat should not simply transfer the effects of one problem onto another established community.

Plan Change 7 would permanently urbanise highly productive rural land and introduce a large residential settlement into an established rural environment. It would place additional pressure on rural roads, create significant reverse sensitivity effects, increase flooding and stormwater risks, introduce large numbers of domestic animals into an area supporting native wildlife, and fundamentally change the character and amenity of the surrounding rural environment.

We are not satisfied that these effects have been adequately assessed or that all reasonably practicable and feasible alternative locations have been genuinely considered.

The question is not simply whether 230 houses can be built at Rosewood. The question is whether Rosewood is the right place for those 230 houses.

In our view, Council has not yet demonstrated that it is.

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

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

Decision Sought

We respectfully request that Hurunui District Council:

1. Decline Plan Change 7.
2. Retain the land in the Rural Zone.
3. Undertake a genuine assessment of all reasonably practicable and feasible alternative locations.
4. Require independent traffic and road-safety assessments.
5. Require independent stormwater and flooding assessments.

6. Protect existing farming operations from reverse sensitivity effects.
7. Prevent Newcombes Road from becoming the formal or informal beach access route for Rosewood Terrace.
8. Require comprehensive ecological assessment and protection of native wildlife.
9. Ensure all infrastructure upgrades are fully funded by the development and not existing rural ratepayers.
10. Do not approve any Rosewood plan change or land-use change until adequate social and physical infrastructure is demonstrably planned, funded and capable of supporting its growth, with any additional costs appropriately attributed to the development and its future residents, rather than the wider Hurunui ratepayer community.
11. Ensure public participation continues through future significant consent processes.

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.

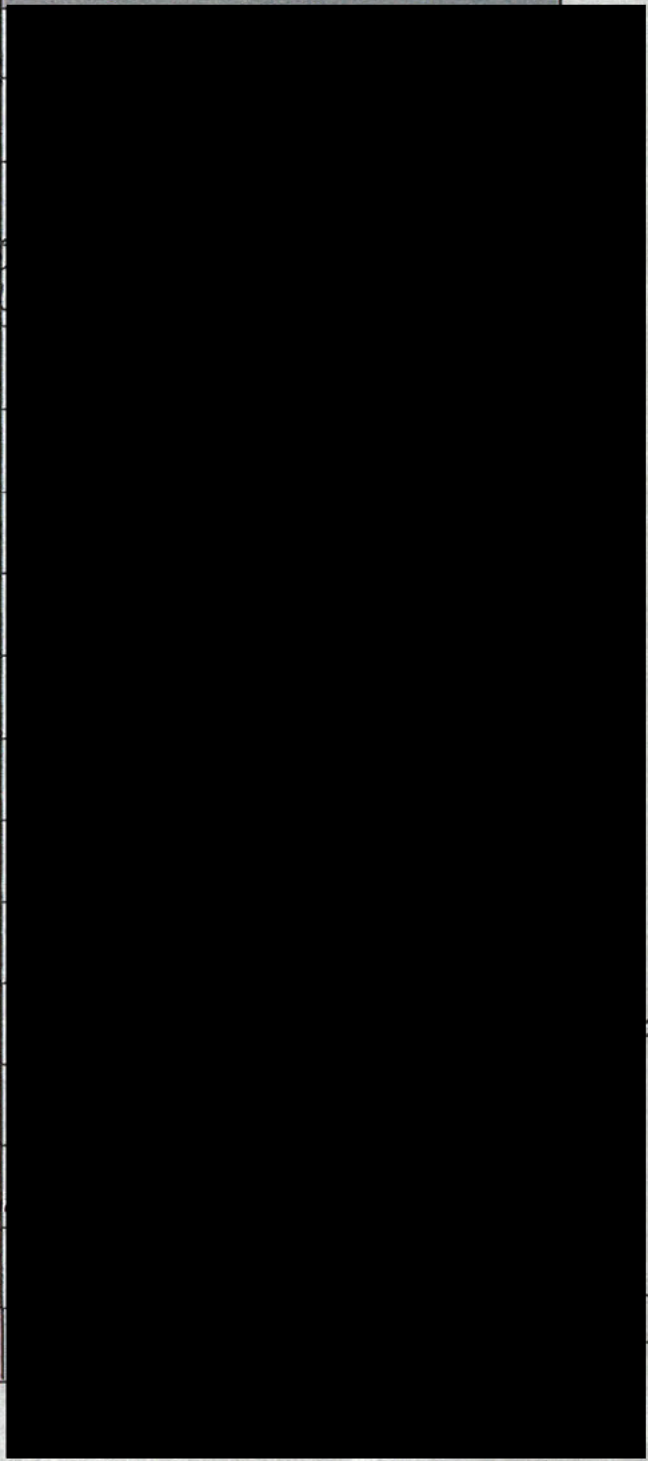
The signatories to this letter OPPOSE the proposed land use change and residential development at the Council owned property known as Rosewood.

- 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>RH</i>	
Michael Toff <i>MT</i>	
Cot Campbell Munro	
Johnny Nalin <i>JN</i>	
Nikki Newin <i>NN</i>	
Mitch Cochrane <i>MC</i>	
Laura Fairbrass <i>LF</i>	
Vicki Sanford <i>VS</i>	
Dave Sanford <i>DS</i>	
Debbie Ducker <i>DD</i>	
Shaun Ducker	
Hilary & Brie Turnbull <i>HT</i>	
Grant Chapman	
Tracey Chapman	
Wayne Chisnell <i>WC</i>	
Jenny & Lucretia D. Chisnell	
Coles Comeack	

Appendix 2

Map of signatory properties



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

20 AUG 2026

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:

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)

Linda Tayles and Ian Tayles

Contact person: Linda

Designation: Local resident and rate payer

Address for service:

14 Bloomfield Street,
Leithfield

Email address:

ian-linda@hotmail.com

Telephone: 027 733 9030

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 proposed plan change 7 in it's entirety

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.

Reasons for my submission

I oppose Proposed Plan Change 7 until the concerns outlined below are properly addressed.

Firstly, I am concerned about the loss of highly productive farmland. Once productive rural land is converted to housing, it is lost forever. I do not believe sufficient weight has been given to the long-term value of this land for food production and the rural character of our district.

I am also very concerned about the increased traffic that a subdivision of approximately 230 homes will generate. In particular, I am worried about additional right-turn movements from State Highway 1 into Hursley Terrace. This intersection is already dangerous and has experienced a high number of crashes. I use this intersection regularly when visiting friends and family along Newcombes Road and am aware of the risks that already exist.

I do not agree with the findings of NZTA regarding traffic movements. Common sense tells me that Hursley Terrace is the most convenient and direct route for people travelling to and from Amberley and Christchurch. As a result, I believe many residents of the proposed subdivision will choose to use this route. I am concerned that the traffic effects have been underestimated and that increased traffic volumes will lead to more crashes and put lives at risk.

Another concern is the lack of facilities for cyclists and pedestrians along Hursley Terrace. It is already a popular route for cyclists, and the addition of hundreds of new residents will only increase the number of people walking and cycling in the area. Hursley Terrace should be upgraded to provide safe facilities for cyclists and pedestrians, the road should be widened where necessary, and consideration should be given to reducing the speed limit to improve safety for all road users.

I am also deeply concerned that the social infrastructure required to support the scale of growth proposed for Amberley is not currently in place. Our medical centre, schools and emergency

services are already under significant pressure, yet I have not seen a clear plan demonstrating how these essential services will be expanded to accommodate the additional residents generated by Rosewood and the other developments occurring in the area.

This is not simply a theoretical concern. We have experienced the pressure on our emergency services firsthand. When I recently called an ambulance for Ian, we were initially told there would be a 30-minute wait. We were then contacted by the doctor and advised that we needed to make our own way to the Amberley medical centre because the ambulance service was too busy to attend.

When we arrived at the medical centre, the doctor immediately called for an ambulance and requested urgent assistance due to concerns that Ian's condition was life-threatening.

This experience has reinforced for me that our existing emergency and medical services are already operating under considerable pressure. Adding hundreds of additional residents without first ensuring that adequate healthcare, emergency services, schools and other essential social infrastructure are in place is a serious concern.

Rosewood should not be considered in isolation from the significant residential growth already occurring and proposed in Amberley. Before further development is approved, there needs to be a clear and demonstrated plan to ensure that the essential services our community relies upon have the capacity to support the additional population.

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

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

I seek that Proposed Plan Change 7 be declined.

My reasons for Opposing PC7 are:

- The loss of highly productive farmland.
- Increased traffic and safety risks at the already dangerous SH1/Hursley Terrace intersection.
- Concerns traffic impacts on Hursley Terrace have been underestimated, as it is the most direct and convenient route between Amberley and Christchurch.
- The lack of safe infrastructure for cyclists and pedestrians on Hursley Terrace.
- The need for road safety improvements including road widening and consideration of reduced speed limit.
- Concerns that local medical services, schools and emergency services do not have the capacity to support the additional residents.
- Absence of a clear plan to provide the infrastructure and services to accommodate this growth.

For all of these reasons I oppose proposed Plan Change 7 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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 - 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: *

Vanessa McPherson

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 Report

Appendix C - Economic Impact Statement

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.

Council has not established a sufficient basis for converting highly productive land into an approximately 230-lot residential subdivision at 185 Ashworth's Road. The proposal rests on a contested Coastal Adaptation Plan (CAP), assumes community support that has not been established, relies on additional market lots to fund the retreat, and does not demonstrate that alternatives have been properly considered.¶

These matters go directly to s 32 of the Resource Management Act 1991 (RMA) and cl 3.6(4) of the National Policy Statement on Highly Productive Land (NPS-HPL). Council must establish that the rezoning is necessary, that there are no other reasonably practicable and feasible options, and that the benefits of removing highly productive land from primary production outweigh its costs.¶

The issue is simple: has Council established that this retreat proposal is necessary and justified to warrant the permanent loss of approximately 34 hectares of highly productive land?¶

The CAP: the foundation for the retreat¶

Proposed Plan Change 7 (PC7) relies on the CAP as the basis for the proposed retreat, describing the option as "consistent with the CAP". Council states that the natural hazards affecting Amberley Beach and their implications for the settlement's future are "well-known" and have been considered through previous processes, including the CAP. But previous consideration of the hazards does not establish that the assumptions underlying the CAP remain sufficiently reliable, or that the retreat model now proposed is necessary.¶

This matters because PC7 and the Economic Impact Statement (EIS) both proceed on the premise that the community will relocate as a whole. That premise cannot be treated as a settled planning or economic requirement when it has not itself been established — and it cannot be separated from the CAP, which sets the adaptation pathway, including the circumstances in which relocation is contemplated.¶

The CAP explicitly identifies community support as a condition of proceeding with land banking. Council's elected representatives subsequently agreed to allow the CEO to pursue the land purchase on the understanding that general agreement from the community would first be obtained. Yet no formal assessment of current resident uptake has been undertaken, despite Council expressly identifying uptake as a "key risk" associated with the rezoning. Council's assertion that general agreement has been obtained is difficult to sustain when PC7 itself acknowledges that "the level of uptake by Amberley Beach residents of this option is unknown at this time". The unresolved uncertainty is consistent with the community's repeated calls for the CAP to be reviewed and is directly relevant to the robustness of the RMA's s 32 assessment. If community support was expressly contemplated as a condition of the land-banking pathway, on what basis did Council conclude that the condition had been met?¶

That uncertainty extends to Council's claim that PC7 would deliver the community-wide relocation benefits relied upon in the s 32 assessment — including "the proactive relocation of the Amberley Beach community as a whole to retain its sense of community. Without evidence of likely uptake, Council is not entitled to treat community-wide relocation as a benefit of PC7.¶

Paragraph 57 further exposes this problem. Council acknowledges that if uptake by Amberley Beach residents is limited, "more of the development would be taken up by other parties," and considers this poses no particular issues or adverse effects. But if that capacity can be absorbed by other parties regardless of whether Amberley Beach residents relocate, it is not necessary to achieve the stated purpose of the rezoning. The proposal then looks less like development required to facilitate community-wide relocation and more like additional residential subdivision for the wider market. That distinction goes directly to cl 3.6(4)(a) and cl 3.6(5) of the NPS-HPL: that additional lots may be marketable does not establish that they are required to meet expected demand, or that 34 hectares of HPL is the minimum necessary.¶

The retreat rests on an unreviewed and contested evidence base¶

The CAP itself recognises that its evidence base is subject to change. It acknowledges that the information informing the Plan is continually being refined and provides for periodic review to ensure that the Plan remains "fit for purpose." This is consistent with the concerns raised by affected residents, who have repeatedly sought a review of the information and assumptions behind the CAP.¶

This is particularly relevant because PC7 now relies on the CAP to support the proposed retreat pathway and associated rezoning. The Jacobs assessment was not merely background advice; it became an important evidential foundation for the CAP and subsequently informed a range of Council decisions, including:¶

- the CAP and its adaptation pathways;¶
- hazard information recorded on LIMs;¶
- identification of retreat as a future pathway;¶
- Council's purchase of approximately \$3.8 million of land;¶
- borrowing and infrastructure decisions;¶
- the proposed rezoning of approximately 34 hectares of highly productive land; and¶
- conclusions concerning the future value, insurability, and viability of residents' properties.¶

Given the significance of that evidence to PC7 and the magnitude of the decisions now proposed, the issue is not whether Council should plan for climate change. It is whether Council can continue to rely on the CAP, without an independent assessment of the evidence and assumptions underpinning it, when that document is central to the justification for permanently rezoning highly productive land.

That question is heightened by the Government's recent direction concerning the use of high-end climate scenarios. Councils should continue planning for climate risks but has been cautioned against automatically treating SSP5-8.5/RCP8.5 as the central or most likely future when making decisions affecting infrastructure investment, land use, property rights, or rates.

This is directly relevant to s 32(2)(c) of the RMA, which requires Council to assess the risk of acting or not acting where information about the subject matter of the proposed provisions is uncertain or insufficient. A robust s 32 assessment must address that uncertainty. If the evidence underpinning the CAP requires reconsideration, the adequacy of that review determines whether the s 32 assessment remains sound.

Council has allowed the retreat to become a predetermined outcome

The Local Government Act 2002 requires Council to identify and assess reasonably practicable options, consider their benefits and costs, and take into account the views and preferences of affected persons. The significance of the decisions is also relevant to the level of information and analysis required.

Here, the decisions have progressively increased in significance: adoption of the CAP; recording its implications on LIMs; purchase of land for the proposed retreat; approval of substantial borrowing; and now the proposed rezoning of approx. 34 hectares of highly productive land. Yet the underlying retreat strategy continues to rely on the same contested evidence base, while residents' requests for a review have not been resolved. The question is whether Council has maintained an open and evidence-based process, or whether the retreat has become the predetermined outcome against which each subsequent decision has been made.

The NPS-HPL: the three questions Council must answer

1. Is the rezoning necessary?

Council must establish that the rezoning is necessary. Clause 3.6(4)(a) of the NPS-HPL requires that it provide sufficient development capacity to meet expected demand, while cl 3.6(5) requires the area rezoned to be the "minimum necessary" to provide that capacity.

Cost-neutrality may explain the funding model, but Council must still show why the additional market lots, and the highly productive land required for them, are necessary — not merely necessary to make the funding model viable.

The availability of the additional lots is irrelevant while uptake from Amberley Beach residents remains uncertain. If only five residents relocate, the need for replacement, and therefore additional market, lots would be substantially reduced — and without measured uptake, the same uncertainty applies to the 109 replacement lots themselves.

2. Were alternatives properly considered?

Council concludes that there are no other reasonably practicable and feasible options. However, its assessment appears to begin with predetermined requirements for the retreat — relocation of the entire community, proximity to the coast and Amberley, and financial neutrality — and then assesses sites against those requirements.

The question is whether those requirements were properly established. Earlier consultation may have identified a preference for the community to remain together and close to the beach, but that cannot be equated with current support for relocation under the proposed land-banking option — for the reasons already addressed above.

If the retreat strategy has not been established as necessary, the alternatives assessment is necessarily incomplete. The alternatives cannot be limited to different sites for a predetermined retreat if the underlying question is whether the retreat, in its proposed form, is itself necessary.

3. Do the benefits actually outweigh the loss of highly productive land?

Council's economic assessment depends on avoiding future hazard damage, coastal defence costs, acquisition costs, and declining property values, while protecting landowner equity. But each claimed benefit of PC7 rests on assumptions about the hazard pathway, the necessity and timing of retreat, and — critically — whether landowners actually relocate.

The claimed \$56,680 annual coastal defence cost illustrates the problem. The EIS presents this as a cost avoided through retreat, yet the Amberley Beach community already funds the bund's renourishment through a targeted rate. The EIS should distinguish between costs avoided by retreat and costs that would simply continue or be redistributed. If relocation is voluntary and uptake is unknown, the extent of any claimed saving is inevitably uncertain. The EIS also states that "Council invested \$750,000 in foreshore protection in 2023/24" —

inevitably uncertain. The EIS also states that Council invested \$700,000 in fireproof protection in 2020/21; this is misleading, as the expenditure is incorrectly attributed to Council rather than the community.

The EIS assumes relocation will mitigate the financial impact on landowners, while acknowledging that increasing recognition of hazard risk may affect property values and mortgageability. Yet Council appears not to have considered whether the economic unviability of remaining at Amberley Beach is being created or accelerated by the very hazard information, LIM entries, retreat framework and associated publicity on which the proposed relocation is based.

The reasoning here appears circular: hazard modelling informs the CAP; the CAP informs LIMs and the retreat framework; those measures affect property values and perceptions of viability; and that resulting loss of viability is then relied upon to justify retreat. If the hazard evidence underpinning the strategy is itself questionable, the economic benefits said to flow from it cannot be taken as given.

The question is whether reducing Council's financial risk, together with benefits that remain unproven and, in part, self-created through Council's own hazard framework, is sufficient to justify the permanent loss of highly productive land.

Conclusion

The Amberley Beach Residents are not questioning whether climate change is occurring or whether managed retreat may eventually be appropriate. The question is narrower: has Council established a sufficiently reliable, current and community-supported basis for permanently rezoning approx. 34 hectares of highly productive land for a residential development whose primary purpose is to facilitate a retreat that remains contested?

It has not. The CAP's assumptions have not been independently reviewed despite their increasingly significant consequences; residents' requests for a review remain unresolved; the community support contemplated by the CAP does not appear to have been established; resident uptake remains unknown; the proposal's financial viability depends on at least 120 additional market sections subsidising the relocation; and the alternatives assessment appears to have been undertaken within the parameters of a retreat strategy whose necessity remains disputed.

Council cannot justify the permanent loss of a substantial amount of highly productive land by relying on a retreat it has not established is necessary, demand it admits is unknown, and development capacity whose principal justification is to fund that retreat.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

For these reasons, the Hearing Panel should decline PC7 in its current form.

In the alternative, the Hearing Panel should not approve the proposed rezoning of approximately 34 hectares of highly productive land unless Council first demonstrates:

1. **Necessity:** why the proposed rezoning is necessary to provide the development capacity required to meet expected demand under cl 3.6(4)(a) of the NPS-HPL, having regard to the actual and likely uptake by Amberley Beach residents;
2. **Minimum area:** why approximately 34 hectares is the minimum area of HPL necessary to provide that capacity, as required by cl 3.6(5);
3. **Market lots:** why the proposed additional market lots are necessary for the purposes of cl 3.6(4)(a), rather than principally being required to subsidise or achieve financial neutrality for the retreat;
4. **Alternatives:** why there are no other reasonably practicable and feasible options, including options involving a different scale, timing, location or structure of the proposed retreat;
5. **Evidence base:** independently review whether the evidence and assumptions underpinning the CAP remain sufficiently reliable, current and fit for purpose to support the proposed rezoning, including the treatment of climate-risk scenarios. Any review of the Jacobs report should be undertaken by an independent expert with no involvement by Jacobs, given the report's central role in the CAP and the significance of the decisions stemming from it.
6. **Community uptake:** what level of participation by Amberley Beach residents can reasonably be expected, and what implications different levels of uptake have for the amount and type of development capacity required; and
7. **Costs and benefits:** whether the benefits of rezoning HPL actually outweigh the costs of its permanent loss, based on a transparent and independently reviewed economic assessment; and
8. **Section 32:** whether, having regard to those matters, a revised s 32 assessment adequately addresses the uncertainty, risks of acting and not acting, and the costs and benefits of the proposed provisions.

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:

Contact details for submitter

Address: *

Street Address

c/- 26 Holton Road

Address Line 2

City

Amberley

Postal / Zip Code

7410

State / Province / Region

Canterbury

Country

New Zealand

Phone number:

21,715,225

Email: *

vanmarlee19@gmail.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.

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.



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: *

Debra Ducker

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.

Plan Change 7 - Rosewood Terrace in its entirety, specifically rezoning 185 Ashworths Road to Residential 1 Zone.

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 STRONGLY OPPOSE Plan Change 7 for the following reasons:

1. Erosion of Rural Character: Our 4-hectare property at 229 Hursley Terrace Road is in an established rural neighborhood. Adding 230 suburban lots 1km away changes our area from rural to suburban.
2. Traffic & Road Safety: Hundreds of daily commuter cars on Hursley Terrace and Ashworths Roads create severe safety risks and road damage on narrow roads used for heavy farm machinery.
3. Impractical Relocation Proposal: While \$11,000 sections are being offered, expecting beach residents to relocate their existing homes is not a practical proposal. Approximately 90% of these beach houses are unrecoverable or structurally unsuitable for moving. Forcing residents to bear the massive costs of demolition, disposal, and building anew makes this plan unviable for those it claims to assist, while permanently destroying productive rural land.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

That Plan Change 7 be declined in its entirety, and the land at 185 Ashworths Road retain its current Rural Zone classification.

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

229 Hursley Terrace Road

Address Line 2

City

Amberley

State / Province / Region

Nth Canterbury

Postal / Zip Code

7481

Country

New Zealand

Phone number:

272,029,778

Email: *

debbieducker08@gmail.com

Contact person:

Name and designation if applicable

Debbie

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.

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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: *

Matthew Dixon

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 specific parts of the proposal my submission relates to:

1. The transport, access infrastructure, and traffic safety elements resulting from the proposed residential zoning overlay.

2. The environmental effects on rural character, residential amenity, and open-sky illumination.

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.

Submission Point 1: Traffic Volumes and Infrastructure Capacity

- **My submission is:** I oppose the rezoning as currently proposed due to the significant risk of excessive traffic volumes entering **Hursley Terrace Road**. The current rural road design and local corridor infrastructure are entirely unsuited to handle the vehicle movements generated by high-density residential subdivisions. A huge spike in traffic will severely degrade the local safety, noise levels, and rural amenity value of the road for existing residents. There will likely be serious accidents at the intersection of Hursley Terrace Road and SH1.

■

Submission Point 2: Light Pollution and Dark Sky Preservation

- **The specific part of the proposal my submission relates to:** The environmental effects on rural character, residential amenity, and open-sky illumination.
- **My submission is:** I oppose the rezoning due to the negative impacts of artificial light at night (ALAN). The transition from Rural to Residential 1 zoning will introduce a dense concentration of domestic outdoor lighting, security lights, and street lighting. This increased light pollution will severely spill into the night sky, permanently ruining my long-term enjoyment of dark skies for astronomy and degrading the unique natural nightscape of the area.
- **The decision I seek from the Council is:** Decline the plan change, or insert strict, legally enforceable lighting rules within the Outline Development Zone overlay. These rules must require all fixtures to be fully shielded (downward-facing only), utilize warm-spectrum LEDs (maximum 2700K), and enforce strict curfew hours for non-essential outdoor illumination to protect local dark sky activities.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

- **The decision I seek from the Council is:** Decline the plan change proposal unless comprehensive traffic calming infrastructure is mandated, or alternative primary access points are developed to prevent Hursley Terrace Road from being used as a high-volume thoroughfare.

- **The decision I seek from the Council is:** Decline the plan change, or insert strict, legally enforceable lighting rules within the Outline Development Zone overlay. These rules must require all fixtures to be fully shielded (downward-facing only), utilize warm-spectrum LEDs (maximum 2700K), and enforce strict curfew hours for non-essential outdoor illumination to protect local dark sky activities.

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

215 Hursley Terrace Rd

Address Line 2

City

Amberley Beach

State / Province / Region

Canterbury

Postal / Zip Code

7421

Country

New Zealand

Phone number:

21,756,345

Email: *

mdmdmd1966@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):

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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: *

Shau Ducker

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.

Plan Change 7 - Rosewood Terrace in its entirety, specifically rezoning 185 Ashworths Road to Residential 1 Zone, transport networks, active transport infrastructure, and wastewater/coastal environment impacts.

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 STRONGLY OPPOSE Plan Change 7. As a 4-hectare rural resident at 229 Hursley Terrace Road, my reasons are:

1. Wastewater Infrastructure Failure & Coastal Risk: The Amberley Wastewater Treatment Plant is already failing to cope. Treated and partially treated wastewater is leaching onto neighboring farmland and surrounding wetlands, during significant rain events. Also during normal conditions draining directly into the Mimimoto Lagoon as the discharge area can't cope with the amount the plant is discharging significantly more wastewater than its consented limits allow. Adding 230 homes to an already overloaded treatment system will severely worsen coastal and environmental contamination.

Before any decisions go ahead this would need a full and independent investigation.

2. Unfunded Pedestrian & Cycle Safety Risks: The proposed subdivision is 4 to 5 kilometers from Amberley township along narrow rural roads and highways without footpaths, street lighting, or cycleways. The Council has provided no clear proposal or costings for how residents and children will safely reach town, threatening to impose massive, unbudgeted infrastructure costs on local ratepayers.

3. Traffic & Road Safety: Adding 230 homes creates heavy daily commuter traffic on narrow rural roads like Hursley Terrace Road, creating major safety risks alongside tractors and farm machinery.

4. Undermining Rural Zoning: Rezoning this large rural block sets a dangerous precedent that overrides the District Plan and destroys investment certainty for rural landowners.

5. Unrealistic Relocation Model: The \$11,000 section price masks true costs. Expecting beach residents to relocate homes is impractical as most are unrecoverable, leaving residents with huge demolition and new build costs that make this proposal unviable for those it aims to help.

6. Climate Projections: Extreme climate scenarios should not be used to override established property rights and existing rural character.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

That Plan Change 7 be declined in its entirety, and the land at 185 Ashworths Road retain its current Rural Zone classification.

Furthermore, I seek that Council pause any future consideration of Plan Change 7 until:

1. An independent environmental investigation is conducted into the performance, consent compliance, and capacity of the Amberley Wastewater Treatment Plant regarding wastewater leaching onto local farmland, the Mimimoto Lagoon, and Amberley Beach.

2. Full safety audits and cost estimates for required active transport infrastructure (footpaths/cycleways to Amberley township) are published for ratepayer review.

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

229 Hursley Terrace Road

Address Line 2

City

Amberley

State / Province / Region

North Canterbury

Postal / Zip Code

7481

Country

New Zealand

Phone number:

275,922,175

Email: *

aaconstructionltd@hotmail.com

Contact person:

Name and designation if applicable

Shaun Ducker

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:
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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: *

Alan James Hood

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 Report - A - B - C - D - E - F - G

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 as a Rate Payer totally appose the HDC Buying this Prime Farm Land - changing the Land Zoning to be able to create a Subdivision 7Kms away from Amberley - The HDC deciding by themselves to move the Beach Town of Amberley Beach to Prime Farm Land after THEY DECIDE THE DECISION TO CHANGE THIS FARM LAND ZONING SO AS THEY CAN CREATE THIS SUBDIVISION - I as a Rate Payer do not UNDERSTAND HOW LAND OWNERS in AMBERLEY BEACH THAT HDC SAY IS DOOMED - ARE ABLE TO SELL THESE DOOMED PROPERTIES TO NEW OWNERS - WHO SHOULD KNOW THIS LAND IS DEEMED TO NEED TO BE CLEARED AND REBUILT ON ANOTHER BLOCK OF LAND - WHY SHOULD PEOPLE BUYING LAND THAT HDC SAY NEEDS TO BE CLEARED - BE INCLUDED IN ANY DEAL ? AFTER ALL THEY ARE BUYING LAND THAT HDC SHOULD BE SAYING NOONE SHOULD BUY ?

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

I as a RATE PAYER want HDC to DO WHAT WE AS RATE PAYERS VOTE THEM IN TO DO ONLY ! THAT DOES NOT INCLUDE CLIMATE CHANGE LAND CHANGE ISSUES. I WANT TO SEE HDC TO TOTALLY STOP THIS AMBERLEY BEACH SHIFT OF THE TOWNSHIP - SPEND NO MORE MONEY ON IT AT ALL. LEAVE DECISIONS LIKE THIS TO CENTRAL GOVERNMENT AS SURELY THAT IS THERE PLACE TO DEAL WITH THESE MATTERS.

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

45 Courage Road Amberley

Address Line 2

City

Christchurch

State / Province / Region

Canterbury

Postal / Zip Code

7410

Country

New Zealand

Phone number:

276,353,408

Email: *

hood.alan@gmail.com

Contact person:

Name and designation if applicable

Alan Hood

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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Submission 43 Document intentionally removed. This page has been retained as a placeholder to maintain the integrity and sequence of the published 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: *

Mitchell Cochrane

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.

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 Mitch.pdf

207.85KB

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:

21,791,185

Email: *

mitch@cladd.co.nz

Contact person:

Name and designation if applicable

Note to submitter:

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Submission on Proposed Plan Change 7 – Rosewood Terrace

To: Planning Team, Hurunui District Council

Submitter: Mitch Cochrane

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. Specific impacts on Newcombes Road

As a resident of Newcombes Road, I am particularly concerned about the direct effects that Proposed Plan Change 7 could have on our road and on the people who live along it.

The proposed residential development is likely to substantially increase the number of people seeking access to Amberley Beach. Newcombes Road provides a direct route for beach access and, as the surrounding population increases, it is reasonable to expect a corresponding increase in vehicle movements, including cars carrying families, visitors, trailers, bicycles, pedestrians, and other recreational users.

Newcombes Road is a rural road and is not currently designed or maintained for a significant increase in this type or volume of traffic. The road is narrow and visibility is limited in places, making it difficult for vehicles travelling in opposite directions to safely pass. An increase in traffic would increase the likelihood of conflict between vehicles and could create particular risks for pedestrians, cyclists, children, and other vulnerable road users.

There is also the potential for a significant increase in traffic at peak times, particularly during weekends, holidays, and fine weather when large numbers of residents and visitors may wish to access the beach at the same time. This could result in congestion and vehicles having to pull over, reverse, or manoeuvre on a narrow rural road to allow other traffic to pass.

The impact is not limited to traffic volumes. Increased use of Newcombes Road would directly affect the amenity and daily lives of the people who live along the road. Residents could experience increased noise, dust, disturbance, loss of privacy, and a fundamental change in the quiet rural character of the area.

I am also concerned about the end of Newcombes Road and the lack of adequate facilities to accommodate increased beach access. There is no suitable formal parking area, turning area, or infrastructure designed to manage a substantial increase in visitors. Increased demand could result in informal or unsafe parking, vehicles blocking access, damage to road edges or adjoining land, and difficulties for residents, service vehicles, and emergency vehicles.

The cumulative effects also need to be considered. Newcombes Road may experience increased traffic not only from future residents but also from construction vehicles, contractors, service providers, delivery vehicles, and visitors associated with the development. During the construction and development period, heavy vehicles and increased traffic movements could cause further deterioration of the road and additional disruption for existing residents.

Before the plan change is approved, Council should require a specific assessment of the effects of the proposed development on Newcombes Road. This assessment should consider existing traffic volumes, projected increases in residential and recreational traffic, road safety, pedestrian and cyclist safety, parking and turning requirements, emergency access, road maintenance requirements, and the cumulative effects of construction traffic.

Any necessary upgrades to Newcombes Road, including improvements to road width, sightlines, drainage, pedestrian safety, parking, turning facilities, and ongoing maintenance, should be fully assessed, funded, and completed before development proceeds. Existing residents should not be left to bear the safety, amenity, maintenance, or financial consequences of increased use generated by a new residential development.

For those of us who live on Newcombes Road, this proposal has the potential to fundamentally change the nature of our local environment and daily lives. The effects on this existing rural community should be given significant weight in Council's consideration of Proposed Plan Change 7.

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.

11. Specific and cumulative impacts on Newcombes Road and groundwater

As a resident of Newcombes Road, I am particularly concerned that the full range of effects of Proposed Plan Change 7 on this road and the surrounding rural community may not be adequately recognised. The impacts should not be assessed solely on the basis of the additional vehicle movements generated by new residential lots, but should include the cumulative effects of increased residential, recreational, visitor, construction, service and infrastructure traffic.

Increased use of Newcombes Road

Newcombes Road provides access to the beach and is likely to experience increased use as the surrounding residential population grows. In addition to daily vehicle movements from new residents, the development may generate additional traffic from visitors, families, holidaymakers, delivery and service vehicles, cyclists, pedestrians and people towing trailers or other recreational equipment.

Traffic effects may be particularly significant during weekends, public holidays and periods of fine weather, when greater numbers of people may travel to the beach at the same time. This could create congestion and safety issues on a narrow rural road where visibility is limited in places and vehicles may need to slow, stop, pull over or reverse to allow other traffic to pass.

I am concerned that Newcombes Road could increasingly become a preferred route for recreational and beach access traffic despite not being designed or maintained for a substantial increase in vehicle movements.

Road safety and emergency access

Increased traffic on Newcombes Road would affect not only vehicle movements but also the safety of pedestrians, cyclists, children and other vulnerable road users. As more people use the road to access the beach, the potential for conflict between vehicles and people walking or cycling would increase.

There are also concerns about emergency access. Any increase in roadside parking, congestion or vehicles manoeuvring in narrow areas could make access more difficult for emergency services, including ambulances and fire appliances. The ability of residents and emergency vehicles to safely access and travel along the road should be assessed before any development proceeds.

Parking, turning and beach access

The end of Newcombes Road does not have adequate formal infrastructure to accommodate a significant increase in beach visitors. There is a risk that increased demand could result in informal or unsafe parking, vehicles blocking access, damage to

road edges or adjoining land, and vehicles using private entrances or unsuitable areas to turn around.

Increased visitor numbers may also result in additional noise, disturbance and rubbish, affecting the amenity and privacy of residents living along the road. These effects should be properly assessed rather than assuming that beach access can absorb a substantial increase in use without appropriate infrastructure.

Construction traffic and ongoing road maintenance

The effects on Newcombes Road should also include construction and infrastructure traffic associated with the development. Heavy vehicles, contractors, machinery and service vehicles could increase noise, dust, vibration and safety risks and may accelerate deterioration of the road surface and road edges.

I am concerned that the costs of repairing, upgrading and maintaining roads affected by the development could ultimately fall on existing residents or the wider ratepayer base. Any additional maintenance, repairs or upgrades required as a direct or cumulative result of the development should be appropriately funded by the development rather than transferring those costs to the existing community.

Groundwater and water supply

I am also concerned about the potential effects of a substantial residential development on groundwater resources and existing water supplies in the surrounding rural area, including properties along Newcombes Road.

Before the plan change is approved, there should be a clear assessment of the existing groundwater environment, the proposed source of water supply for the development, the capacity and long-term sustainability of that supply, and any potential effects on existing residents who rely on local groundwater or private water supplies.

The assessment should consider not only the immediate water requirements of the proposed development but also the cumulative effects of increased residential development and future growth in the wider area. Existing residents should not face reduced water availability, declining groundwater levels, reduced reliability of supply or additional costs as a consequence of new development.

Potential effects on groundwater quality should also be assessed, including risks associated with wastewater, stormwater, earthworks, construction activities and changes in land use. Appropriate monitoring and protection measures should be identified before development proceeds, with clear responsibility for addressing any adverse effects.

Cumulative effects

I am concerned that individual effects may appear relatively minor when considered separately, but together could fundamentally change the character, safety and amenity of Newcombes Road and the surrounding rural area.

The cumulative assessment should include:

- Increased traffic from new residents and their visitors;
- Increased beach and recreational access;
- Construction and infrastructure traffic;
- Service and delivery vehicles;
- Pedestrian and cyclist safety;
- Parking and turning requirements;
- Emergency vehicle access;
- Road deterioration and ongoing maintenance;
- Noise, dust and disturbance;
- Effects on groundwater and existing water supplies; and
- The potential for further residential development and increased pressure on the surrounding rural road network.

These matters should be assessed together and over the long term, rather than considering each effect in isolation.

Before Proposed Plan Change 7 is approved, I request that Council require a specific assessment of the actual and cumulative effects of the development on Newcombes Road and the surrounding rural community.

If the plan change proceeds, any road upgrades, safety improvements, parking and turning facilities, infrastructure works, groundwater monitoring or other mitigation measures required as a result of the development should be clearly identified, fully funded and secured before development occurs. Existing residents should not be left to bear the safety, amenity, environmental or financial consequences of increased development in the area.

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: 2 Aug 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)

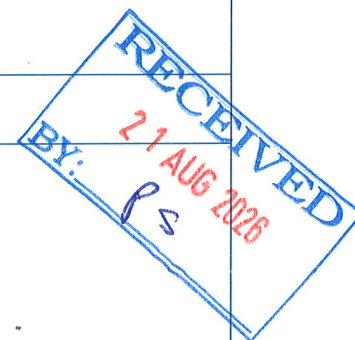
Burnamui Higgs

Contact person:

Designation:

Resident

Address for service:

1 South Crescent
Amberley

Email address:

Burnamui27@gmail.com

Telephone:

0272161207

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:

Pages following

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.

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

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

Pages following.

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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Submission Opposing Hurunui District Council Plan Change 7 – Rosewood Terrace

To: Hurunui District Council

Plan Change: Plan Change 7 – Rosewood Terrace,
185 Ashworths Road, Amberley

Submitter: [Your full name]

Address: [Your address]

I wish to be heard at the hearing: Yes

1. My position

I oppose Plan Change 7 in its present form.

1. My position

I oppose Plan Change 7 in its present form.

I consider that the proposed rezoning of approximately 34 hectares of rural land at 185 Ashworths Road for residential development has not been sufficiently justified, particularly given the loss of highly productive land, the scale of the proposed development, the financial implications for the Amberley Beach community and ratepayers, and the uncertainty surrounding the coastal hazard assumptions upon which the proactive relocation strategy is based.

I support sensible, evidence-based measures to

strategy is based.

I support sensible, evidence-based measures to protect the Amberley Beach community from genuine coastal hazards. However, I do not accept that rezoning highly productive rural land and creating up to approximately 230 residential sections is the only, or necessarily the best, way of achieving that objective.

The proposal appears to have evolved from a community coastal adaptation process into a substantial residential development project. The Commissioners should carefully examine whether the proposed rezoning remains proportionate to the original purpose of protecting and providing options

the proposed rezoning remains proportionate to the original purpose of protecting and providing options for the existing Amberley Beach community.

2. The proposal is substantially larger than simply relocating the Amberley Beach community

The Council's own documentation identifies approximately **109 existing Amberley Beach properties** as the community intended to benefit from the proactive relocation proposal.

However, Plan Change 7 would enable approximately **230 residential lots**.

However, Plan Change 7 would enable approximately **230 residential lots.**

HDC's economic assessment acknowledges that the additional lots are intended to help make the proactive relocation financially viable. In other words, a significant part of the proposed urbanisation is not simply replacing existing Amberley Beach homes; it is creating additional residential development whose sale is intended to assist with financing the relocation scheme.

This raises a fundamental question:

Is Plan Change 7 genuinely a coastal adaptation

Is Plan Change 7 genuinely a coastal adaptation and relocation proposal, or has coastal adaptation become the justification for creating a substantial new residential subdivision on rural land?

The distinction matters.

If the primary purpose is the protection and relocation of 109 existing households, then the Council should demonstrate why the rezoning of land sufficient for approximately 230 sections is necessary, why less land cannot achieve the objective, and why the additional residential capacity should be created on highly productive

objective, and why the additional residential capacity should be created on highly productive land.

I ask the Commissioners to require a transparent assessment of:

- the precise number of sections required for the existing Amberley Beach community;
- the number of sections intended for existing residents who actually wish to relocate;
- the number of sections that will be available to the general market;
- the financial assumptions behind the sale of

• the number of sections that will be available to the general market;

- the financial assumptions behind the sale of those sections;
- the risks if the market does not purchase those sections at the assumed prices;
- who will ultimately carry the financial risk; and
- whether ratepayers could become responsible for costs if the development does not perform as anticipated.

3. Loss of highly productive land

I strongly oppose the conversion of productive rural land to urban development.

3. Loss of highly productive land

I strongly oppose the conversion of productive rural land to urban development.

HDC's own landscape assessment states that the property is predominantly **Land Use Capability Class 2 (LUC2)**, with a smaller portion of LUC3, and confirms that it is subject to the National Policy Statement for Highly Productive Land.

The current NPS-HPL provides national direction requiring highly productive land to be protected for land-based primary production and requires stringent consideration before highly productive

The current NPS-HPL provides national direction requiring highly productive land to be protected for land-based primary production and requires stringent consideration before highly productive land is rezoned for urban development.

The Council's economic assessment acknowledges that the rezoning must be assessed against the NPS-HPL provisions.

I therefore ask the Commissioners to scrutinise whether the statutory tests have genuinely been met rather than accepting the proposition that this particular piece of productive land is simply the

I therefore ask the Commissioners to scrutinise whether the statutory tests have genuinely been met rather than accepting the proposition that this particular piece of productive land is simply the most convenient location for the Council's preferred relocation model.

In particular, the Council should demonstrate with evidence:

1. why the proposed urban zoning must occur on highly productive land;
2. what alternative sites were properly investigated;
3. whether suitable land outside highly productive

3. whether suitable land outside highly productive land exists;
4. whether the search area was sufficiently broad;
5. why the proposed urban footprint is the minimum necessary;
6. whether a smaller development could achieve the relocation objective; and
7. whether the social and economic benefits genuinely outweigh the permanent loss of productive rural land.

The fact that the Council has already purchased the property should not become a reason for the

The fact that the Council has already purchased the property should not become a reason for the planning process to approve the urbanisation of that property.

The planning decision should be based on what is appropriate under the relevant statutory framework, not on the fact that Council has already committed substantial public funds to acquiring the land.

4. The community consultation process requires much greater scrutiny

I acknowledge that the Coastal Adaptation Plan

I acknowledge that the Coastal Adaptation Plan involved extensive engagement over several years. However, I do not consider that historic consultation on coastal hazards should automatically be treated as community support for the current Rosewood Terrace proposal.

The CAP was a process about understanding coastal hazards and developing adaptation pathways.

Plan Change 7 is a specific proposal to rezone rural land and ultimately facilitate a major residential subdivision.

These are not the same decision

Those are not the same decision.

The Council itself now describes Plan Change 7 as the formal opportunity for the public to have its views considered. HDC has stated that this is likely to be the most significant formal opportunity for public participation in the decision-making process.

 Hurunui District Council

That makes it particularly important that residents have adequate information about the actual consequences of the proposal.

I am concerned that many residents may have

I am concerned that many residents may have participated in the CAP on the understanding that the purpose was to protect their community and investigate possible future adaptation pathways, rather than agreeing in principle to a 230-lot residential development on productive farmland.

I ask the Commissioners to distinguish clearly between:

support for coastal adaptation

and

support for Plan Change 7.

They are not necessarily the same thing.

5. Existing residents cannot simply be expected to move their houses

One of the fundamental weaknesses in the relocation concept is the assumption that existing residents can simply move to a new site.

For many residents, a house is not a movable asset.

Existing homes are physically fixed structures with foundations, services, garages, landscaping,

Existing homes are physically fixed structures with foundations, services, garages, landscaping, retaining structures, accessways and other improvements.

Even where a house is theoretically capable of being relocated, relocation can involve substantial costs and practical difficulties.

For many homeowners, the realistic alternative is demolition and construction of a replacement dwelling.

That is an entirely different proposition.

That is an entirely different proposition.

A person may own land at Amberley Beach but not have the financial capacity to fund a new house on another section.

The Commissioners should therefore not treat the provision of a replacement section as equivalent to providing a replacement home.

A section is not a house.

6. Financial capacity of existing residents

I am particularly concerned about the financial consequences for existing Amberley Beach

6. Financial capacity of existing residents

I am particularly concerned about the financial consequences for existing Amberley Beach residents.

Many residents are ordinary homeowners who have spent decades establishing their homes. They may have mortgages, retirement income limitations, fixed incomes or insufficient equity to finance a new dwelling.

The fact that a new section might be made available to an existing resident does not solve the problem of financing a replacement house.

to an existing resident does not solve the problem of financing a replacement house.

The Commissioners should require a detailed and independent assessment of the actual affordability of the proposed relocation model.

That assessment should include:

- the cost of a replacement dwelling;
- demolition costs where required;
- site preparation;
- infrastructure and connection costs;
- professional fees;

- professional fees;
- consenting costs;
- financing costs;
- moving costs;
- landscaping and external works;
- increases in construction costs;
- interest rates;
- the financial position of older residents and retirees; and
- the ability of residents to obtain finance.

- the ability of residents to obtain finance.

The Council should not assume that because a section is offered at a particular price, relocation is financially achievable.

7. Climate science and the use of future scenarios

I accept that climate change and coastal hazards must be taken seriously.

However, decisions with consequences extending many decades into the future must be based on transparent, proportionate and appropriately

However, decisions with consequences extending many decades into the future must be based on transparent, proportionate and appropriately interpreted scientific evidence.

I am concerned about the reliance placed on high-end climate scenarios and the potential for those scenarios to be interpreted by decision-makers or the public as predictions rather than risk scenarios.

HDC itself acknowledges that scenarios such as SSP5-8.5 are used to test the consequences of more severe future conditions and states that the use of a high-emissions scenario does not mean that it is assumed to be the most likely outcome.

use of a high-emissions scenario does not mean that it is assumed to be the most likely outcome.

Hurunui District Council

That distinction is critically important.

If high-end scenarios are being used to justify present-day expenditure and irreversible planning decisions, the Council should clearly demonstrate:

- which climate scenarios have been used;
- why each scenario was selected;
- what probability or likelihood, if any, is associated with each scenario;

associated with each scenario;

- how sensitive the conclusions are to different scenarios;
- how sea-level rise assumptions have changed since the original CAP;
- what new scientific information has become available;
- whether the hazard modelling has been independently peer reviewed; and
- whether the proposed response would remain justified under lower or intermediate scenarios.

The CAP itself recognises that the scientific

justified under lower or intermediate scenarios.

The CAP itself recognises that the scientific information will continue to be refined and that the plan should be periodically reviewed.

 ArcGIS StoryMaps

That supports a cautious, adaptive approach rather than automatically committing to an irreversible large-scale urban development now.

8. The Coastal Adaptation Plan was intended to be adaptive

The Amberley Beach CAP describes itself as an adaptive, trigger-based approach rather than a

simple time-based programme.

It expressly recognises uncertainty and provides for pathways to be reviewed as new information becomes available.  ArcGIS StoryMaps

I therefore question whether permanently rezoning productive rural land and establishing a major residential development is consistent with the underlying adaptive philosophy.

An adaptive strategy should allow future decisions to respond to actual changes in risk.

It should not unnecessarily lock the Council,

It should not unnecessarily lock the Council, residents and ratepayers into one expensive pathway before the relevant triggers have been reached.

I ask the Commissioners to consider whether the appropriate response is to preserve options rather than commit to the maximum development pathway now.

9. The existing coastal bund should not be prematurely discounted

The existing coastal bund is an important part of the current defence system.

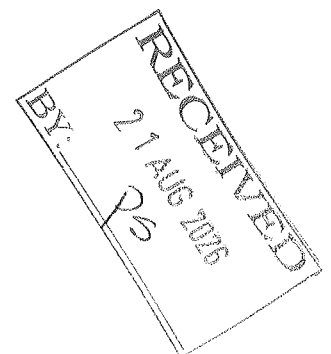
Part 2

9. The existing coastal bund should not be prematurely discounted

The existing coastal bund is an important part of the current defence system.

The Council has already invested in its renourishment, with the completed bund extending approximately 1.1 kilometres along the Amberley Beach township. HDC states that the works were developed following community consultation and were completed in early 2025. Hurunui District Council +1

I question whether sufficient consideration has been given to continuing to maintain and improve the



I question whether sufficient consideration has been given to continuing to maintain and improve the existing first line of defence while monitoring actual hazard changes.

If particular forms of hard protection were previously considered unacceptable or supposedly unavailable because of Environment Canterbury consenting requirements, then the Council should provide the Commissioners with the documentary evidence supporting those statements.

Specifically, I request disclosure of:

supporting those statements.

Specifically, I request disclosure of:

- the relevant Environment Canterbury correspondence;
- any resource consent applications made;
- any resource consent applications considered and rejected;
- the reasons for any refusal;
- the engineering options considered;
- the costs of those options; and

the reasons those options were discounted.

- the reasons those options were discounted.

The community should not be asked to accept assertions about what Environment Canterbury would or would not permit without seeing the evidence.

10. The green loan and financial risk

The Council has obtained a **\$23.5 million green social and sustainability loan** associated with the coastal adaptation project. Public reporting states that the loan was intended to fund land acquisition, planning and potentially the subdivision and infrastructure required for the proposed new village.

This creates a significant concern about whether financial commitments made in connection with coastal adaptation are now creating pressure to proceed with the proposed subdivision.

The existence of a loan should not determine the planning outcome.

Nor should a financial requirement to sell surplus sections become a justification for rezoning more productive rural land than is otherwise necessary.

I ask:

If Plan Change 7 is declined, what happens to the green loan?

If only some Amberley Beach residents choose to relocate, who carries the financial risk?

If the additional sections cannot be sold at the assumed values, who carries the shortfall?

What happens to existing ratepayers if development costs exceed the current assumptions?

Has an independent development-finance expert verified the Council's assumptions?

Has an independent development-finance expert verified the Council's assumptions?

These questions are fundamental to the claim that the proposal can be cost neutral to the wider community.

11. The proposal creates a substantial new subdivision beyond the existing community

I am concerned that a project originally justified around approximately 109 existing Amberley Beach properties could result in approximately 230 residential lots.

11. The proposal creates a substantial new subdivision beyond the existing community

I am concerned that a project originally justified around approximately 109 existing Amberley Beach properties could result in approximately 230 residential lots.

The additional land and sections are effectively being used to help finance the relocation.

This means that a coastal hazard response is being combined with a significant new residential subdivision.

The Commissioners should carefully consider the precedent this creates.

If productive rural land is rezoned because a Council-owned subdivision needs additional market sections to fund an adaptation project, there is a risk that the planning process becomes driven by the economics of the subdivision rather than the actual environmental and community need.

I do not believe that is an appropriate basis for irreversible land-use change.

12. Landscape and character

12. Landscape and character

The proposed development would transform a substantial rural property into an urban settlement.

This would result in:

- loss of rural character;
- increased traffic;
- new roads;
- infrastructure;
- lighting;
- stormwater infrastructure;
- wastewater infrastructure;

- stormwater infrastructure;
- wastewater infrastructure;
- increased built form;
- additional vehicle movements; and
- long-term urbanisation of productive rural land.

The visual and landscape effects should not be treated simply as the consequence of relocating an existing community.

The proposal potentially creates a new settlement of approximately 230 lots.

13. A better approach is to preserve options

I am not opposed to planning for the long-term safety of Amberley Beach.

I am opposed to treating one particular large-scale development solution as inevitable.

A more prudent approach would be to:

1. continue monitoring actual coastal hazards;
2. maintain and appropriately consent the existing coastal protection works;

3. independently review the coastal hazard modelling;
4. review the CAP against the latest available scientific information;
5. properly investigate alternative relocation sites, including land outside highly productive land;
6. establish the actual number of residents who wish to relocate;
7. determine the real cost of replacement homes rather than simply replacement sections;
8. independently assess the financial viability of the

8. independently assess the financial viability of the relocation proposal;
9. assess who carries financial risk if the market subdivision does not perform;
10. consider a smaller staged development if relocation becomes necessary; and
11. retain flexibility to respond to future evidence.

This would be consistent with the adaptive principles that underpin the CAP.

14. Relief sought

I respectfully request that the Independent Hearing

14. Relief sought

I respectfully request that the Independent Hearing Commissioner:

1. Decline Plan Change 7 in its present form.

Alternatively, if the Commissioner is not prepared to decline the proposal outright:

2. Defer the decision until the following matters have been independently assessed and publicly reported:

- an independent review of the coastal hazard modelling;

- an independent review of the coastal hazard modelling;
- an independent assessment of the climate scenarios relied upon;
- a comprehensive assessment of alternatives to rezoning highly productive land;
- a full financial viability assessment;
- an independent assessment of the financial risk to ratepayers;
- a detailed assessment of the actual number of Amberley Beach residents seeking relocation;
- a detailed assessment of the affordability of

Amberley Beach residents seeking relocation,

- a detailed assessment of the affordability of replacement housing;
- full documentation regarding the coastal bund options and Environment Canterbury consenting position;
- a comparison between continued coastal protection and proactive relocation;
- and a transparent assessment of why approximately 230 sections are required when the identified existing community comprises approximately 109 properties.

3. Require any future development to be staged,

3. Require any future development to be staged, with the scale of development linked to demonstrated demand from existing Amberley Beach residents rather than relying from the outset on a large speculative open-market subdivision.

4. Ensure that highly productive land is not rezoned unless the Council can clearly demonstrate that the statutory tests for its urbanisation have been satisfied and that there is no reasonably practicable and feasible alternative.

5. Require full transparency regarding the green loan, project costs, development assumptions,

5. Require full transparency regarding the green loan, project costs, development assumptions, expected section prices, interest costs, infrastructure costs and the allocation of financial risk.

15. Conclusion

Amberley Beach residents deserve a genuine long-term solution to coastal hazards.

However, protecting a community from coastal risk should not automatically require the permanent loss of productive rural land or the creation of a large new residential subdivision.

development to help finance that relocation.

Those objectives should not be allowed to become conflated.

The Council must demonstrate that the proposed rezoning is necessary, proportionate, financially sound, environmentally responsible and consistent with the national direction protecting highly productive land.

It must also demonstrate that residents are being given a genuinely achievable relocation option rather than simply being offered a new section and

It must also demonstrate that residents are being given a genuinely achievable relocation option rather than simply being offered a new section and expected to somehow finance and construct a replacement home.

The Coastal Adaptation Plan was founded on an adaptive approach which recognises uncertainty and allows decisions to change as evidence and circumstances change.

I believe that principle should be respected.

For these reasons, I oppose Plan Change 7 and ask that it be declined.

15. Conclusion

Amberley Beach residents deserve a genuine long-term solution to coastal hazards.

However, protecting a community from coastal risk should not automatically require the permanent loss of productive rural land or the creation of a large new residential subdivision.

The proposed Plan Change 7 appears to combine two objectives: relocating an existing community and creating enough additional residential development to help finance that relocation.

Those objectives should not be allowed to become

adaptive approach which recognises uncertainty and allows decisions to change as evidence and circumstances change.

I believe that principle should be respected.

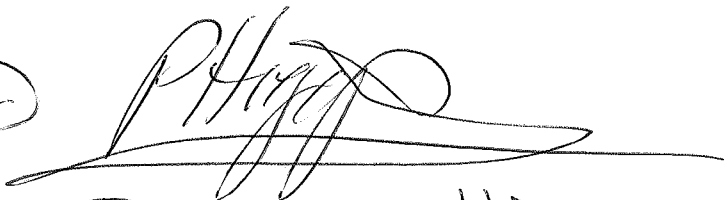
For these reasons, I oppose Plan Change 7 and ask that it be declined.

I wish to be heard in support of this submission.

Signed: _____

Name: _____

Date: _____

Signed 

Name Pounamu Higgins.

Date 2 Friday Aug 2026.

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: *

Elizabeth Ann Goodwin

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:

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:

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 in 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.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

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.

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

40 Chamberlain Avenue

Address Line 2

RD1

City

Amberley Beach

Postal / Zip Code

7481

State / Province / Region

Canterbury

Country

New Zealand

Phone number:

33,149,448

Email: *

Goodwin.ann@gmail.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.

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.

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: *

Tony Lowsley

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 own property at Amberley Beach

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 rezoning for many reasons.

The Council failed to consult us residents before purchasing the land, we found out through the news media.

The residents of Amberley Beach would be severely disadvantaged financially and would not be able to afford the cost of building a new home.

The land purchase has been rushed through before we know the details of the land swap or pursued any other alternatives.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

The land should not be rezoned until the residents of the Amberley Beach have been made aware of all the details of the land swap deal so that we can make a fully informed decision.

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

Amberley Beach

City

North Canterbury

State / Province / Region

Canterbury

Postal / Zip Code

7481

Country

New Zealand

Phone number:

21,367,943

Email: *

uhavwon@gmail.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

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To: Hurunui District Council

Name of submitter: *

Leslie Smart

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.

- Another example of reduction in productive farmland in NZ
- Shifting of stormwater flooding onto Newcombes Rd area, the Kowai river mouth and surrounding area and the stormwater waste facilities the council maintains directly below the proposed subdivision

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 from rural 1 to residential 1 zone
- I note in the plan change the term Proactive Relocation of the Amberley Beach community. This seems to suggest forced relocation rather than a suggestion.
- I am concerned this will set a precedent for Leithfield Beach.
- it does not appear that the HDC has considered alternatives. On investigation other councils are putting in interlocking erosion control structures that are robust, fit for purpose and fit with council core activity requirements.
- The purchase of the site has been debt funded I understand. The interest alone would go a long way to putting in the above mentioned erosion control structures.
- People that purchased property at Amberley Beach did so because of its location.
- This development will impact storm water flooding and the Amberley sewerage scheme and put more pressure on the Kowai River delta causing increased back flooding which is already problematic to the area.
- This is a conflict between councils core activity and councils moving into the private sector.
- It appears to be a costly move at Ratepayers expense

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

- This is an ad hoc decision, especially relating to the district plan.
- It is divisive and very costly to the ratepayers. There has been no poll or referendum sought to ascertain if the community support the expenditure.
- The decision I am seeking is the consent authority deny the HDC plan change 7.

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

71 Kings Rd

Address Line 2

Leithfield

City

Amberley

Postal / Zip Code

7481

State / Province / Region

North Canterbury

Country

New Zealand

Phone number:

212,022,290

Email: *

bluejeans08@xtra.co.nz

Contact person:

Name and designation if applicable

Leslie Smart

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:
- 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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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).

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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: *

Michael Goodwin

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:
 the proposed rezoning of part of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone;
 the proposed Outline Development Zone overlay and associated Outline Development Plan;
 the provisions, policies, rules, explanatory material and implementation framework associated with the proposed rezoning;
 the stated purpose of the plan change, being to enable the proactive relocation of the Amberley Beach settlement due to natural hazard risks;
 the proposed residential development capacity and layout shown in the Outline Development Plan;
 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
 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:

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 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:

- the triggers for any relocation process are clear, objective, evidence-based and publicly available;
- relocation is not treated as automatic merely because the land has been rezoned;
- affected Amberley Beach residents are consulted before any relocation process is activated;
- Council clearly states whether relocation is voluntary, and if not, precisely identifies the legal basis and threshold for any non-voluntary step;
- the existing Amberley Beach community is kept together, or substantially together, wherever reasonably practicable;
- 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
- 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:

- updated technical hazard assessments identifying a material increase in risk to life, property, access, essential services, infrastructure or habitability;
- measurable coastal erosion, inundation, flooding, groundwater or other natural hazard thresholds;
- material compromise or repeated failure of essential infrastructure, including road access, stormwater, wastewater, water supply, emergency access or other servicing;
- formal advice from appropriately qualified independent experts that continued occupation of affected areas presents an unacceptable or materially increased risk;
- statutory, regulatory, insurance, infrastructure or access constraints that materially affect residents’ ability to continue living safely and sustainably at Amberley Beach;
- a formal Council resolution based on publicly available reporting and technical evidence;
- direct consultation with affected Amberley Beach residents before any relocation pathway is activated; and
- staged implementation, recognising that not all properties or households may be affected in the same way or at

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:

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

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

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:

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

Retain an Outline Development Plan framework for the Rosewood Terrace development.

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.

Include clear, objective and evidence-based triggers for any Council decision to initiate, recommend, facilitate, or materially advance the relocation of Amberley Beach residents.

Require that any relocation trigger be supported by current technical evidence, publicly available information, and direct consultation with affected Amberley Beach residents.

Require Council to consult directly with Amberley Beach residents before any relocation pathway is activated.

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.

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.

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.

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.

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.

Require transparent reporting to affected residents on infrastructure costs, servicing, rating impacts, development contributions, lot pricing, affordability measures and any resident contribution requirements.

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.

Require Council to adopt or publish a relocation implementation framework before any relocation pathway is activated.

Make any further, alternative or consequential amendments necessary to give effect to this submission.

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

40 Chamberlain Ave

Address Line 2

Amberley Beach

City

Amberley

Postal / Zip Code

7481

State / Province / Region

Canterbury

Country

New Zealand

Phone number:

Email: *

goodwin.mj@gmail.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:
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- 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: *

Brittany 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: *

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 whole nine yards

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 proposed Plan Change 7 for the coastal adaptation plan for Amberley Beach residents.

I do not believe this plan is in the best interest for Amberley Beach residents and specifically it is not “cost neutral” as the official plans claim. This CAP has already had adverse effects on us financially as former potential buyers have been put off buying at Amberley Beach because of the uncertainty of what’s happening here. Inviting so much media around this has been to the detriment of Amberley Beach residents.

None of the triggers have happened to encourage the council to move so quickly on getting us relocated. The rushed nature of this proposal and the millions of dollars spent on land has me and others suspicious of council intentions. I was also disturbed at the dismissive attitude towards residents and members of the public at some of the community meetings. It showed me that our best interest does not seem a priority to the council.

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? *

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

30 Grierson Avenue

Address Line 2

Amberley Beach

City

Amberley

State / Province / Region

Hurunui

Postal / Zip Code

7481

Country

New Zealand

Phone number:

226,233,142

Email: *

brittanyjenna@gmail.com

Contact person:

Name and designation if applicable

Note to submitter:

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To: Hurunui District Council

Name of submitter: *

Elizabeth Kelsey

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 entire 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.

HDC states that the purpose of this proposed plan change is to *"allow for the proactive relocation of the Amberley Beach settlement, which is subject to multiple hazards... in a manner that is cost neutral to the wider community and which is sensitively located within, and integrated with, the surrounding environment"*. I oppose this plan change because there is no/insufficient evidence that the change would achieve this purpose, including as to, in particular:

1. the financial viability of the relocation for Amberley Beach residents;
2. the social impact of the proposed plan change on Amberley Beach residents;
3. the effect of the proposed plan change on the services delivered to Amberley Beach;
4. the effect of the proposed plan change on work to the Amberley Beach bund/other sea protection efforts;
5. the effect of the timing of the proposed plan change on (1)-(4) above;
6. the suitability of the proposed relocation site in respect of (a) stormwater effects; and (b) sewerage/wastewater treatment facilities;
7. the actual cost on of the proposal on the wider community;
8. loss of amenity for non-beach residents.

In addition, the proposal is inconsistent with the Coastal Adaptation Plan, on which Amberley Beach residents were consulted. The MR&LB Proposal, on which the Council relies, is a 'proposal' only. It has never been consulted upon, approved or otherwise agreed by Amberley Beach residents.

I seek the following decision from the consent authority:

Please be precise about what exactly you are seeking.

Reject the proposed plan change

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

163 Mackenzies Road

Address Line 2

Waipara

City

Amberley

Postal / Zip Code

7483

State / Province / Region

Canterbury

Country

New Zealand

Phone number:**Email: ***

ekelsey@outlook.co.nz

Contact person:

Name and designation if applicable

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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From: Arthur Light <arthurlight@gmail.com>
Sent: 21 August 2026 12:09
To: Planning <planning@hurunui.govt.nz>
Subject: Submission opposing Plan Change PC7

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

To Hurunui District Council

I am a resident of Leithfield Village and we have a family dwelling [owned by my mother] at Amberley Beach in Chamberlain Av. I speak also for my wife and eight children in respect of PC7.

I, Arthur Light, oppose PC7 for these reasons:

1. It is for 230 lots, far more than needed to relocate those properties at Amberley Beach who opt to relocate. This scale drowns out the alleged purpose of PC7 – the managed relocation of Amberley Beach properties.
2. The huge size of the subdivision is to save HDC money, not to achieve the relocation – this is outside the scope of criteria for a Plan Change
3. The location at Rosewood Farm is inappropriate for residential – it is productive farmland and part of the rural ambience and landscape which South Islanders value [especially on State Highway 1 which hosts huge traffic flow. Another urban pimple between Amberley and Leithfield will create an unsightly ribbon development and increase traffic congestion and wreck the charm of the North Canterbury open space region.
4. HDC has been less than open and consultative with Amberley Beach owners about this managed relocation – people who should have been fully informed [like my mother] have been left in the dark.
5. HDC was advised caution by the NZ Government against actions based on extreme and high-end climate change involving Council planning, infrastructure and costs but have proceeded unabated.
6. There is no robust financial analysis on the financial impact on ratepayers of PC7 – the EIA focuses on tweaking lot numbers to try to achieve neutrality but the EIA itself states it is not a financial viability model. Ratepayers do not want to be shouldered with more costs and higher rates. I certainly don't.
7. I endorse and adopt the submissions of Amberley Beach Guardians Inc which I have seen.
8. I wish to be heard in support.
9. I have no trade interests to conflict me in making submissions.

10. I submit that PC7 be declined and my preference is that HDC sells Rosewood Farm and ceases its current unnecessary managed relocation initiatives.

Best Regards
Arthur Light

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: 21/08/2026

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)

ON BEHALF OF ABIRUAC.
(AMBERLEY BEACH RATEPAYERS AND RESIDENTS ASSOCIATION)
Contact person: MARC COULTHARD Designation: CHAIRPERSON

Address for service:

C/O 26 HOLTON ROAD, AMBERLEY BEACH.

MARC@MCD-ARCHITECTURE.CO.NZ

Email address:

Telephone: 0274 589 742

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:

SEE ATTACHED SUBMISSION.

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 SUBMISSION

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

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

SEE ATTACHED SUBMISSION

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 discloses no reasonable or relevant case:
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Proposed Plan Change 7 – Necessity and Justification for Rezoning Highly Productive Land

This submission is by the group known as Amberley Beach Ratepayers and Residents Association and Community (ABRRaC) which is an association of a substantial group of people within the Amberley Beach community and open to all interested people, and with which Hurunui District Council has had dealings with over the years. The committee delegated by this group consists of Marc Coulthard, Paula Le Compte, Tim Goulding, Adèle Brown, John Manason, Jan Manawatu and Pounamu Higgs, All of whom are owners or representatives of owners of property at Amberley Beach.

1. Introduction

Plan Change 7 (PC7) proposes to rezone approximately **34 hectares at 185 Ashworths Road, Amberley**, from Rural Zone to Residential 1 Zone, enabling approximately **230 residential lots**. Council states that the purpose of the plan change is to facilitate the proactive relocation of the Amberley Beach settlement in a manner that is cost neutral to the wider community.

The central issue for the hearing is not whether climate change is occurring, whether Amberley Beach faces natural hazards, or whether relocation might ultimately become appropriate.

The issue is whether Council has established a sufficiently robust basis for the **permanent conversion of approximately 34 hectares of highly productive land (HPL)** to residential use for this particular proposal.

The proposal rests on several assumptions that remain unresolved:

- that proactive relocation of the Amberley Beach community is necessary;
- that relocation will occur as a community rather than through individual voluntary decisions;
- that there will be sufficient uptake by existing Amberley Beach residents;
- that approximately 109 replacement lots are required;
- that an additional approximately 120 market lots are required to make the relocation financially neutral;
- that the proposed site and scale are the minimum necessary; and
- that the benefits of rezoning HPL outweigh the environmental, social, cultural and economic costs of permanently removing that land from primary production.

These matters engage **section 32 of the Resource Management Act 1991 (RMA)** and **clauses 3.6(4) and 3.6(5) of the National Policy Statement for Highly Productive Land 2022 (NPS-HPL)**.

Clause 3.6(4) permits urban rezoning of HPL only where:

1. the zoning is required to provide sufficient development capacity to meet expected demand;
2. there are no other reasonably practicable and feasible options for providing that capacity; and
3. the benefits of rezoning outweigh the costs associated with losing HPL for land-based primary production.

Clause 3.6(5) further requires the spatial extent of the urban zone covering HPL to be the **minimum necessary** to provide the required development capacity while achieving a well-functioning urban environment.

The fundamental question is therefore:

Has Council established that approximately 230 residential lots, and the associated permanent loss of approximately 34 hectares of highly productive land, are necessary and justified to facilitate the proposed Amberley Beach relocation?

The evidence presently available does not establish that they are.

2. The purpose of PC7 does not establish the necessity of its scale

Council describes PC7 as providing for the proactive relocation of the Amberley Beach settlement and making that relocation cost neutral to the wider community.

The Economic Impact Assessment (EIA) makes clear that the proposal is intended to provide **109 lots for existing Amberley Beach property owners**, together with additional market lots whose sale proceeds are intended to fund the development and relocation costs.

This distinction is fundamental.

The 109 relocation lots are intended to replace existing residential capacity.

The additional market lots are not proposed because Council has established a corresponding need for that number of new homes for Amberley Beach residents. They are proposed principally to make the relocation scheme financially neutral.

The EIA expressly states that the scheme's core requirement is financial neutrality and that enough additional lots will be sold on the open market to approximate the costs of land acquisition, development, roading, infrastructure and other costs.

The question under the NPS-HPL is not simply whether those additional lots are financially useful.

It is whether they are **required to provide sufficient development capacity to meet expected demand**.

Those are not necessarily the same thing.

3. Council's own evidence establishes uncertainty about whether and when relocation will occur

The EIA expressly acknowledges:

“there is no way of knowing whether or when the relocation will occur.”

It therefore models a range of potential financial outcomes.

The Council's current public information goes further. It states that approval of PC7 and/or subdivision **does not create any obligation for existing Amberley Beach residents to relocate**, and that any future move will occur only if residents choose to do so and circumstances make relocation desirable. Council describes PC7 as providing **future options rather than requiring immediate action**.

This creates an important evidential issue.

If relocation is voluntary, if Council does not know when it will occur, and if Council does not require existing residents to relocate, then the actual demand for replacement housing at the proposed site is necessarily uncertain.

That uncertainty is directly relevant to the NPS-HPL requirement to establish **expected demand**.

Council cannot simply assume that the entire existing settlement will relocate and then use that assumption to establish the amount of HPL that must be rezoned.

The relevant question is:

What evidence establishes the level of demand for relocation, and therefore the amount of residential development capacity required?

4. The additional market lots present a separate NPS-HPL issue

The EIA's financial modelling indicates that between **96 and 119 market lots** may be required depending on the timing and assumptions used. It then concludes that allowing for approximately **120 market lots** would be reasonable to reduce the risk of the scheme requiring a Council subsidy. The EIA also states that allowing between 120 and 150 market lots could further reduce that risk.

The proposed approximately 230 lots therefore comprise approximately:

- **109 relocation lots**; and
- approximately **121 additional lots**, including market and affordable lots.

The EIA itself acknowledges that the additional lots are required to make the relocation scheme financially neutral.

This is important because the EIA's NPS-HPL assessment then makes a significant logical step. It states that because proactive relocation is necessary and cannot occur without the additional market lots, those market lots become a “necessary part” of the proposal.

That conclusion requires closer examination.

The statutory question is not whether the additional lots make Council's preferred funding model financially viable.

The statutory question is whether the urban zoning is **required to provide sufficient development capacity to meet expected demand**.

A funding requirement is not necessarily a demand requirement.

The distinction should be expressly addressed by Council.

If the additional market lots are required principally to fund the relocation, rather than to meet an established demand for additional housing, on what basis do those lots satisfy clause 3.6(4)(a) of the NPS-HPL?

This is particularly important where the number of residents who will actually relocate remains unknown.

5. The financial evidence does not establish that the proposed development is financially necessary

The EIA contains another important qualification.

It expressly states that its financial assessment **“is not intended to be a financial viability assessment and should not be relied on in that regard.”**

It recommends that, if required, Council undertake or commission financial modelling from a suitably qualified development expert to establish the financial risks and viability of the proposal.

This is significant.

The financial model is being used to inform the amount of development that Council considers necessary, yet the EIA itself cautions that it is not a financial viability assessment.

The assessment also relies on assumptions concerning:

- future lot sale prices;
- development costs;
- construction-cost inflation;
- interest rates;
- market-lot uptake;
- the timing of relocation; and
- the eventual treatment of surplus land.

The EIA acknowledges that these assumptions involve uncertainty.

Accordingly, Council should not treat the number of market lots generated by the model as an established statutory requirement.

At most, the modelling demonstrates what scale of development **may be required under a particular financial model and set of assumptions.**

That is different from establishing that the same development is required under clause 3.6(4)(a) of the NPS-HPL.

6. There is an important discrepancy in the amount of land proposed to be rezoned

The EIA provides further evidence relevant to the requirement that the spatial extent of the urban zone be the **minimum necessary.**

It states that an earlier indicative site plan showed approximately **22.2 hectares** would be required to accommodate 230 lots. It subsequently concludes that at least approximately **22 hectares** would be required to achieve financial neutrality, with approximately **24–27 hectares** of residential zoning considered reasonable to reduce the risk of a Council top-up or subsidy.

Yet PC7 proposes rezoning approximately **34 hectares.** Council's transport assessment confirms that approximately 34.3 hectares is proposed to be rezoned, of which approximately 19.68 hectares is identified for residential development.

This distinction must be properly explained.

Council needs to identify precisely:

- how much of the 34 hectares is actually required for residential lots;
- how much is required for roads;
- how much is required for reserves and open space;
- how much is required for stormwater or other infrastructure;
- how much is required to mitigate adverse effects; and
- why the total area proposed for urban zoning is the **minimum necessary.**

The EIA itself says that the amount of land required to be rezoned was still being worked through and that the financial assessment was intended to inform that process.

That makes the clause 3.6(5) assessment particularly important.

If the EIA identifies approximately 22–27 hectares as the indicative residential land requirement, what is the evidential basis for rezoning approximately 34 hectares, and why is that larger area the minimum necessary?

Council should be required to answer that question clearly.

7. The CAP does not, by itself, establish that this particular retreat proposal is necessary

PC7 relies on the Amberley Beach Coastal Adaptation Plan (CAP) and the proactive relocation strategy developed from it.

The EIA states that the CAP identified managed retreat/proactive relocation as a long-term response to the hazards affecting Amberley Beach.

However, identification of relocation as a possible or preferred adaptation pathway does not automatically establish:

- that relocation must occur now;
- that all residents will relocate;
- that 109 replacement lots will be required;
- that approximately 120 additional market lots are required;
- that 34 hectares must be rezoned; or
- that the Rosewood Terrace proposal is the minimum necessary response.

Indeed, Council's own current information describes PC7 as providing **future options rather than requiring immediate action** and confirms that residents are not obliged to relocate.

The CAP therefore cannot be treated as resolving the statutory questions that PC7 must now answer.

The plan change must independently establish its necessity under the RMA and NPS-HPL.

8. Community preference is not the same as demonstrated demand

Council states that previous engagement with Amberley Beach residents identified a strong desire for any future relocation option to remain close to Amberley Beach. Council says that this preference significantly influenced the area within which alternative sites were considered.

The EIA similarly identifies maintaining the community's social fabric and locating the new settlement close to the existing settlement as important objectives.

Those preferences are relevant.

However, a preference for remaining together and close to Amberley Beach does not establish that residents will actually participate in the proposed land-swap arrangement.

The EIA states that participation is voluntary. Property owners who do not wish to participate may remain at Amberley Beach, although the report anticipates that services may become more basic and properties may eventually become unsafe or financially unviable.

The distinction is therefore between:

preference for a future relocation option, and

demonstrated demand for 109 replacement lots at the proposed site.

Council needs evidence of the latter if it is to rely on the former to justify permanent rezoning of HPL.

9. Alternatives must be assessed against the actual statutory need

Council has undertaken a site-selection process and considered factors including proximity to Amberley Beach and the desire to retain the existing community.

The issue is not therefore that Council has considered no alternatives.

The more fundamental issue is whether the alternatives assessment has been conducted against a sufficiently established **need and scale**.

The EIA identifies a number of requirements for the proposed relocation model, including:

- relocating the settlement as a whole;
- keeping the settlement close to the existing community;
- maintaining proximity to the coast;
- retaining social ties and access to services; and
- ensuring the relocation is financially neutral.

These are legitimate objectives.

But Council must still demonstrate why each is necessary to satisfy the NPS-HPL test, particularly where those objectives have the effect of narrowing the range of alternatives and increasing the amount of HPL required.

For example, if the requirement that the entire community be relocated to one location is a central assumption, Council should demonstrate the evidence supporting that requirement and whether alternative approaches could achieve the relevant safety, social and economic outcomes with less HPL.

Similarly, if financial neutrality is treated as a prerequisite, Council must explain why the statutory test requires Council's preferred funding model rather than simply requiring that the underlying development capacity be justified.

The alternatives assessment should therefore not begin with an assumption that the proposed relocation model is fixed.

It should begin with the statutory question:

What development capacity is required, and what is the least-HPL way of providing it?

10. The section 32 assessment must confront uncertainty

Section 32(2)(c) of the RMA requires Council to assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

There are several material uncertainties here:

- when relocation will occur;
- whether relocation will occur;

- how many existing residents will participate;
- the future cost of development;
- future market values;
- the number of market lots required to achieve financial neutrality;
- the eventual financial outcome;
- the amount of land required; and
- whether the underlying assumptions supporting the CAP remain sufficiently robust for the decisions now being made.

The EIA itself acknowledges uncertainty about the timing of relocation and potential financial outcomes.

This does not mean Council cannot plan for the future.

It means the uncertainty must be properly recognised and addressed in deciding whether the permanent rezoning of HPL is justified now.

The greater the permanence and significance of the decision, the more important it is that Council's evidence demonstrates that the proposed extent of rezoning is necessary and proportionate.

11. The claimed economic benefits must be separated from the costs of the preferred model

Council's case for PC7 includes avoiding future hazard-related costs and reducing financial risks associated with the existing Amberley Beach settlement.

However, the economic case should distinguish between:

1. costs arising from the underlying natural hazards;
2. costs arising from Council's chosen adaptation pathway; and
3. costs and benefits arising specifically from the proposed Rosewood Terrace development.

That distinction is particularly important where the relocation is voluntary and trigger-based.

The EIA states that relocation is not expected to occur immediately and identifies a number of possible future triggers. It also recognises that if relocation never becomes necessary, the land could potentially be sold or used for other purposes.

The proposal therefore involves a substantial present land-use decision in response to a future event whose timing and ultimate occurrence are uncertain.

Council must demonstrate why permanently rezoning HPL now is justified when the actual relocation need may occur substantially later, or potentially not occur in the form presently assumed.

12. The proposed 34-hectare rezoning requires scrutiny

The HPL at issue is not an incidental part of the proposal.

The EIA expressly acknowledges that the land purchased by Council at 185 Ashworths Road is highly productive land and that the NPS-HPL requires its use to be minimised.

The permanent conversion of approximately 34 hectares therefore requires a clear demonstration of necessity.

The evidence currently establishes that:

- 109 lots are intended for potential relocation of existing Amberley Beach property owners;
- additional market lots are intended to fund the relocation;
- the number of market lots required varies according to assumptions;
- relocation timing is uncertain;
- participation by residents is voluntary;
- the financial assessment is not a financial viability assessment;
- approximately 22–27 hectares has been identified in the EIA as the indicative residential land requirement; and
- the proposed plan change nevertheless seeks to rezone approximately 34 hectares.

These matters do not establish that 34 hectares is the minimum necessary.

They demonstrate why Council needs to provide a more rigorous evidential justification for the proposed extent of rezoning.

13. Conclusion

The Amberley Beach residents do not dispute that the settlement faces natural hazards or that proactive relocation may ultimately be an appropriate adaptation response.

The issue is whether the evidence presently before Council justifies **this particular response, at this scale, on highly productive land**.

Council's own documents establish significant uncertainty.

Relocation is voluntary. Council acknowledges that it does not know when relocation will occur. The financial assessment acknowledges uncertainty and expressly states that it is not a financial viability assessment. The additional market lots are required principally to make the relocation scheme financially neutral. The number of market lots required varies according to the assumptions used. And the EIA identifies approximately 22–27 hectares as the indicative residential land requirement, while PC7 proposes to rezone approximately 34 hectares.

The central unresolved issue is therefore not whether the proposed development can be made to work under a particular financial model.

It is whether Council has established the statutory necessity for converting this amount of HPL to residential use.

In particular, Council has not adequately demonstrated:

1. **Need:** that approximately 230 lots are required to meet expected demand, rather than that approximately 230 lots are useful to the preferred relocation funding model;
2. **Relocation demand:** that sufficient Amberley Beach residents will actually participate in the voluntary relocation scheme to justify the proposed replacement capacity;
3. **Additional market capacity:** that the approximately 120 additional market lots satisfy the NPS-HPL requirement for development capacity needed to meet expected demand, rather than simply being required to make the scheme financially neutral;
4. **Minimum necessary area:** why approximately 34 hectares must be rezoned when the EIA identifies approximately 22–27 hectares as the indicative residential land requirement;
5. **Alternatives:** that the underlying scale and form of the proposed relocation are themselves necessary, and that less HPL-intensive options cannot reasonably achieve the required outcomes;
6. **Evidence and uncertainty:** that the uncertainties concerning relocation timing, participation, development costs, market demand and financial viability have been adequately addressed under section 32(2)(c); and
7. **Overall benefits and costs:** that the environmental, social, cultural and economic benefits of permanently removing approximately 34 hectares of HPL from primary production outweigh the corresponding costs.

The NPS-HPL does not establish a test of whether Council's preferred development model is financially attractive or capable of being made cost neutral.

It requires Council to establish that the urban rezoning of HPL is **necessary**, that there are **no other reasonably practicable and feasible options**, and that the **benefits outweigh the costs**, with the spatial extent being the **minimum necessary**.

Those requirements have not been sufficiently demonstrated.

Relief sought

For these reasons, the Hearing Panel should **decline PC7 in its current form**.

In the alternative, before any rezoning of HPL is approved, Council should be required to:

- establish the actual level of demand and likely participation by Amberley Beach property owners;
- separately justify the 109 relocation lots and the additional market lots against clause 3.6(4)(a) of the NPS-HPL;
- provide a robust and independent financial viability assessment rather than relying solely on the current EIA financial modelling;
- clearly identify why approximately 34 hectares is the minimum land area necessary under clause 3.6(5);

- undertake a comprehensive assessment of reasonably practicable and feasible alternatives, including alternatives to the proposed scale and structure of the relocation model; and
- address the uncertainties identified above through a robust section 32 assessment.

Until those matters are properly established, there is insufficient evidential basis to justify the permanent loss of approximately 34 hectares of highly productive land for PC7.



Federated Farmers of New Zealand

Submission on Proposed Plan Change 7 to the Hurunui District Plan

21 August 2026



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SUBMISSION TO HURUNUI DISTRICT COUNCIL ON PROPOSED PLAN CHANGE 7 TO THE HURUNUI DISTRICT PLAN

Form 5

Submission on publicly notified proposal for policy statement or plan

Clause 6 of First Schedule, Resource Management Act 1991

To: *Hurunui District Council*

Name of submitter: North Canterbury Province, Federated Farmers of New Zealand

Contact person: Dr Lionel Hume
Senior Policy Advisor

Address for service: Federated Farmers of New Zealand
c/- Farmlands Cooperative
535 Wairakei Road
Christchurch

Phone: 027 470 9008

Email: lhume@fedfarm.org.nz

This is a submission on the following proposed plan change – Proposed Plan Change 7 to the Hurunui District Plan.

Federated Farmers could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that the submission relates to and the decisions we seek from Council are as detailed on the following pages.

Federated Farmers wishes to be heard in support of this submission.

SUBMISSION ON PROPOSED PLAN CHANGE 7 TO THE HURUNUI DISTRICT PLAN

Overview

Federated Farmers welcomes the opportunity to provide feedback to Hurunui District Council on Proposed Plan Change 7 to the Hurunui District Plan.

Federated Farmers of New Zealand is a voluntary, primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers and their communities.

Federated Farmers aims to add value to its members' farming businesses by ensuring that New Zealand provides an economic and social environment within which:

- Our members may operate their businesses in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

The economic importance of the agricultural sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%. Land-based primary sector exports comprise about 80% of New Zealand's total merchandise exports. Any legislation or regulation which affects farm businesses has the potential to also impact, positively or negatively, on district, regional and national economies and social structure.

Proposed Plan Change 7 – Rosewood Terrace

The Hurunui District Council has initiated a plan change to the Hurunui District Plan to rezone part of the property at 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.

Submissions

Federated Farmers' submissions on Proposed Plan Change 7 are set out below, along with decisions sought. In addition to the submissions themselves, we request that any consequential amendments will be made to give effect to those submissions.

Urban Rezoning of Highly Productive Land

Hurunui District Plan

In Chapter 3 (Rural) of the Hurunui District Plan, Issue 3 highlights the value of soil resources to the district, as follows:

The soil resources of the district are vital to the sustainability of agricultural activities, however most of the district's high quality soils adjoin existing settlements and the expansion of settlements can have an irreversible impact on the district's high quality soil resources. It is important to retain the life-supporting capacity of high quality soils for a variety of future land uses especially when much of this soil is located in and around settlements.

Further, Objective 3.2 states that *Rural areas are managed so that primary production activities are able to be carried out efficiently and effectively* and Policy 3.2 requires Council *To protect highly productive soils by discouraging activities that will have adverse effects on their continued productive use and life-supporting characteristics that are difficult to reverse.*

Therefore, Federated Farmers believes that Proposed Plan Change 7 is inconsistent with requirements in the District Plan as they relate to highly productive soils in the rural zone.

National Policy Statement for Highly Productive Land

It is acknowledged in the Section 32 Report that the proposed rezoning needs to meet the criteria set out in clause 3.6(4) of the National Policy Statement (NPS) for Highly Productive Land 2022.

Clause 3.6(4)(a) requires that *the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district.* Council argues that the new housing land is needed to meet demand from the current residents of Amberley Beach, as their current settlement becomes increasingly threatened by flooding and coastal erosion. Federated Farmers acknowledges the concern expressed by Council but suggests that the requirement of Clause 3.6(4)(a) remains paramount until that need (for new housing land) is clearly demonstrated. We suggest that many of the Amberley beach residents have deliberately chosen to live where they are and would prefer to stay put. Further, many of the current Amberly Beach residents would not have the financial resources to build a new home in the proposed subdivision, even if the sections were offered at very favourable prices.

Clause 3.6(4)(b) requires that *there are no other reasonably practicable and feasible options for providing the required development capacity.* It is pointed out in the section 32 Report that other land options considered were also on highly productive land. However, Federated Farmers considers that the overarching point is that demand for the new subdivision is lacking in the first place.

In relation to clause 3.6(4)(c), Federated Farmers contends that 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*, as required by the NPS. History demonstrates that once productive land is lost, it is rarely recovered.

Clause 3.6(5) requires that territorial authorities must *take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.* In Plan Change 7, council is proposing to rezone approximately double the land area needed to re-home the residents

of Amberley Beach. The reason given by Council is that the greater area is needed so that additional sections can be sold to achieve cost neutrality. This is not a reason allowed for by the NPS for Highly Productive Land.

Decision Sought:

Based on the arguments presented above, Federated Farmers opposes the rezoning proposed in Proposed Plan Change 7 to the Hurunui District Plan, because it conflicts with relevant provisions of the District Plan and the NPS for Highly Productive Land.

Therefore, Federated Farmers asks that Proposed Plan Change 7 does not proceed.

Other Issues

Cost Neutrality

Federated Farmers appreciates planning to make the project cost neutral for the wider community, as set out in Appendix C: Economic Impact Assessment. If the project goes ahead, we ask that Council adheres to that principle for all aspects of the development, including roads, water supply, wastewater, stormwater and ongoing maintenance.

Reverse Sensitivity Issues

Policy 5.6 of the Hurunui District Plan requires Council *to ensure that subdivision is designed to avoid, remedy or mitigate potential reverse sensitivity effects on other land uses.*

The proposed new subdivision is completely surrounded by rural land. If it goes ahead, it is almost inevitable that reverse sensitivity issues will occur. This will likely mean complaints about such things as noise, dust, stock movement, odour, spraying, the use of heavy machinery and farming operations (along with associated sound and light) taking place early in the morning or late at night. Consequently, there may well be pressure on Council to impose restrictions on farming activities to protect rural amenity.

Farming land uses immediately adjacent to the proposed new subdivision include livestock (sheep and Beef) and cropping (mostly barley and wheat). Activities which could give rise to reverse sensitivity include spraying, direct drilling, baling lucerne hay (sometimes late at night), weaner beef calves bellowing (for a few days following arrival) and harvesting of wheat and barley (possibly into the evening with consequent noise and light).

If the subdivision goes ahead, Federated Farmers asks that every effort is made to avoid reverse sensitivity issues, including design measures such as appropriate layout, buffer zones and strategic planting.

Additional Road Traffic

If the new subdivision goes ahead as planned, there will be over 100 new homes in addition to those relocating from Amberley Beach. This will put considerable additional pressure on the local roading network. Council is planning to improve access to SH1 to cope with greater traffic numbers requiring that access, but there will also be greater pressure on local roads generally e.g. to get to Amberley without using SH1 and to access Amberley Beach. Traffic wishing to access Amberley without using

SH1 will likely use Hursley Terrace Road. There is at least one farmer who owns land on both sides of Hursley Terrace road and needs to move sheep across the road approximately once per month.

If the new subdivision proceeds, roading issues need to be carefully planned for and funded so that the costs of upgrades don't fall on the wider community, particularly rural rate-payers.

Decision Sought:

As above, Federated Farmers is opposed to Proposed Plan Change 7, in its entirety, and asks that it does not proceed.

If the plan change does proceed, Federated Farmers asks that:

- Cost neutrality is strictly adhered to, and that costs do not fall upon the wider community, especially rural rate payers;
- Reverse sensitivity issues are planned for and avoided or mitigated to the greatest extent possible, and that additional constraints are not placed on surrounding land-users;
- Additional road traffic is planned for and managed without disrupting or preventing the routine activities of the surrounding rural community (e.g. stock crossing roads).

Conclusion

Federated Farmers thanks Hurunui District Council for considering its submission on Proposed Plan Change 7 to the Hurunui District Plan. We look forward to ongoing dialogue about Plan Change 7 and continuing to work constructively with Council.



Bex Green
Chair, Canterbury Regional Policy Committee
and
President, North Canterbury Province
Federated Farmers of New Zealand

Submission Opposing Plan Change 7 – Rosewood Terrace

21/8/26

Submitters: Graeme and Sally Sutherland**Address:** 22 Grierson Ave, Amberley Beach**Contact:** gsutherland@xtra.co.nz

We are writing to OBJECT to the proposed rezoning of 185 Ashworths Road from Rural Zone to Residential 1 Zone.

We live at 22 Grierson Ave in Amberley Beach. We recently moved to this location 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 and that full infrastructure aspects have not been taken into overall consideration and fully investigated at what extra ratepayer costs are going to be incurred for the whole district.

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.

We also do not believe that the Council has looked at all aspects of sea wall protection. In our view a precedence has already been set in the Approval of a rock wall protection facility to be installed at Gore Bay in North Canterbury which is also managed by Hurunui District Council. Surely this should have been on the agenda of Council for Amberley Beach. This raises the question of why this has not been considered and actioned.

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.

We believe this plan is no longer fit for purpose and with the current Government comments re Coastal management a new Plan should be investigated and be peer reviewed by qualified persons.

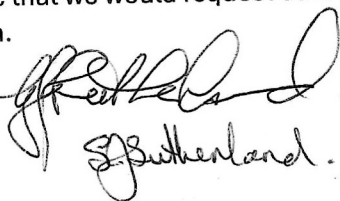
The previous plan assumptions have found to be incorrect and the question being raised has the 2023 CAP report actually been peer reviewed at all?

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 the 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.

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

Please note that we would request consideration for us to appear personally to present this submission.

Signature:


GSutherland.

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: 20/08/2026

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: James Clark Silcock

Contact person:

Designation:

Address for service: residence, 30 Holton Road, Amberley Beach

Email
address: jamesilcock72@gmail.com

Telephone: 0211130177

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:

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.

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.

My submission is in support

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, walk ability 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:

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

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.

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.

From: kate.henry.chch@posteo.net <kate.henry.chch@posteo.net>

Sent: 21 August 2026 13:10

To: Planning <planning@hurunui.govt.nz>

Subject: Objection to PC7 for Rosewood Farm

[You don't often get email from kate.henry.chch@posteo.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Mayor Marie Black and HDC Planning Department
Hurunui District Council

Dear Mayor Black and HDC Planning Department

RE: PC7 for Rosewood Farm

We are writing to strongly oppose Hurunui District Council (HDC) Plan Change PC7 for Rosewood Farm and to strongly oppose the relocation of Amberley Beach residents.

We wish to be heard at any future hearings.

Our reasons include, but are not limited to the following:

1. HDC's purported motivation for PC7, is the supposed threat to Amberley Beach from extreme climate change caused by carbon dioxide. Many scientists have proven this theory to be nonsense, including the internationally esteemed Prof William Happer (https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thegwpf.org%2Fimages%2Fstories%2Fgwpf-reports%2Fhapper-the_truth_about_greenhouse_gases.pdf&data=05%7C02%7Cplanning%40hurunui.govt.nz%7C54c638b86e4646823f6508deff211574%7C45e128df95e64d2db1f74ded3ffc2e4b%7C0%7C0%7C639228715517146226%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMilslkFOljoIjWTFpbGlldUljoyfQ%3D%3D%7C60000%7C%7C%7C&sdata=HT%2FqqRdFWSNOaukkV9XyF7W%2B6e5PJ4sCo50O19TlqVY%3D&reserved=0)

We are happy to supply other proofs, if asked.

2. HDC has not obtained authoritative evidence regarding hazard risk. HDC has relied solely on a report by Jacobs. Jacobs has been widely

discredited in the area of coastal planning and risk analysis. The documentary film Managed Out, is one resource, amongst many, that details the discrediting of Jacobs

Managed

Out <https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fvimeo.com%2F1116949304&data=05%7C02%7Cplanning%40hurunui.govt.nz%7C54c638b86e4646823f6508deff211574%7C45e128df95e64d2db1f74ded3ffc2e4b%7C0%7C0%7C639228715517164514%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMilslkFOljoitWFBpbCIsIlldUljoyfQ%3D%3D%7C60000%7C%7C%7C&sdata=EtDmJOy2nER47R%2FsWZEcfDfimJiHsxzrdEJlg2N%2B0LU%3D&reserved=0>

3. The various coastal disasters that have happened in New Zealand over recent years, have all initially been attributed to climate change by politicians and main stream media, but after detailed research, were all shown to be the result of neglect and incompetence, mainly by local councils. A recent such event is the tragedy at Mt Manganui. Regarding Amberley Beach, HDC has also demonstrated neglect and incompetence over some years, around its poor maintenance of the bund between the beach and settlement. In particular: the incorrect use of rock armour and the poor design to prevent beach erosion by normal forces. It is also generally understood amongst locals, that for some years, the extra money for bund repair paid to HDC by Amberley Beach ratepayers, was diverted to other projects in the Hurunui, instead of being used for bund repair. Please correct us if this understanding is wrong.

4. Ratepayers do not want another urban settlement on rural land between Amberley and Leithfield. Rosewood Farm is productive agricultural land with good soils and should remain so.

5. The proposed development of the 86.9 hectare Rosewood Farm, would result in many hundreds of new houses, which would in effect create a substantial new settlement. It would not be part of Amberley, or Amberley Beach or Leithfield. It would likely have no facilities of its own, so would mean residents have to drive everywhere, to fulfil all their daily requirements of shopping, doctor, library, etc. This would result annually, in many thousands of extra car journeys with consequent extra pollution and ironically: carbon dioxide release. If council wishes to allow for future growth, it should encourage more development in and around Amberley, where there are existing facilities and where any extra commercial facilities would be appropriate and welcome. HDC should also be encouraging current and future residents of Amberley to walk or cycle to local facilities. This would have the combined benefits of making roads safer for children, reducing noise, reducing pollution and reducing carbon dioxide – which HDC purports to be very concerned about.

6. Creating a new settlement on Rosewood Farm would cause SH1 between Leithfield and Amberley to become even more dangerous than it is now. You will be aware that after several serious accidents on the Mill Rd/SH1 junction near Kowai Bridge, NZTA are currently investigating what to do as regards traffic calming and possible road closure measures. Thousands more annual vehicle movements in this vicinity, will result in many more serious accidents.

7. It is our understanding that HDC borrowed the purchase price of \$3.2 million for Rosewood Farm. This is a huge and irresponsible borrowing,

especially during a property market downturn

<https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.1news.co.nz%2F2026%2F08%2F01%2Fproperty-markets-longest-and-deepest-downturn-in-30-40-years%2F&data=05%7C02%7Cplanning%40hurunui.govt.nz%7C54c638b86e4646823f6508deff211574%7C45e128df95e64d2db1f74ded3ffc2e4b%7C0%7C0%7C639228715517176537%7CUnknown%7CTWFPbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIslAIoiXaW4zMilsIkFOljoITWFpbCIsldUljoyfQ%3D%3D%7C60000%7C%7C%7C&sdata=jDkd2k9foyQCVL7FJ2gOJ0KAC14W3M5VoOv7Qe8hK84%3D&reserved=0>

and especially when economists have been warning of an imminent economic recession. HDC will surely expect ratepayers to cover future losses. As ratepayers, we are very unhappy about this extra risky borrowing and we would not agree to pay extra rates to cover HDC losses. In our opinion, any losses should be carried by whoever in HDC made the decision to purchase Rosewood Farm.

8. It is our opinion, HDC has no business doing subdivisions, but should leave such things to private developers, who are better suited to take such risks. HDC should stick to their core job of providing normal infrastructure to ratepayers, including ratepayers at Amberley Beach.

9. It is our understanding from locals, that Amberley Beach property owners have been offered a relocation package by HDC which amounts to swapping their property in Amberley Beach for a section in the proposed new settlement on Rosewood Farm. Whilst to date this has been voluntary, there is a clear threat that it risks becoming compulsory, not least due to the nonsensical climate emergency narrative, hyped up by discredited Jacobs. For property owners, this would amount to swapping a livable property valued at approximately \$500,000 for a bare section valued at approximately \$200,000. It is also our understanding, that if a property is compulsorily purchased, the owner has to pay to have their home demolished and removed. It is our opinion that using hyped-up reports of impending coastal disaster written by the discredited Jacobs, to frighten property owners into accepting swaps such as above, is akin to gangster behaviour. It is a shameful and disgraceful way to treat anyone, but especially your own ratepayers. Please correct us if we have misunderstood about this swap arrangement.

In summary: the HDC proposed development of Rosewood Farm is irresponsible and inappropriate. We do not know of anyone who supports this plan and we strongly oppose it entirely.

We recommend for HDC to either sell Rosewood Farm as is, or divide it into four hectare lots for individual sale. The latter course of action would have the benefit of recouping what HDC borrowed, and thus reduce HDC liabilities, at a time of property downturn and imminent recession.

Kindly acknowledge receipt of this email.

Yours sincerely

Stewart and Kate HENRY

3 Mill Rd
Leithfield.

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:

21/08/26

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)

LOIS FLORENCE

NEWICK

Contact person:

Designation:

Address for service:

14 HOLTON ROAD
AMBERLEY BEACH
R.D. 1
AMBERLEY 7481

Email address:

Telephone: 027 956 0022

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 HAVE LIVED AT AMBERLEY BEACH FOR OVER TEN YEARS

I PURCHASED HERE TO BE CLOSER TO FAMILY AND THAT I COULD AFFORD TO BUY HERE.

BEING ON A SINGLE VERY LIMITED INCOME OF THE PENSION, ALL FACTORS AS TO WHY I MOVED HERE.

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 FULLY OPPOSE THIS PCT FOR THE FOLLOWING REASONS

A) POTENTIAL LOSS OF SMALL CLOSE COMMUNITY.

B) UNKNOWN TIMING OF IF OR WHEN IT MAY OR MAY NOT HAPPEN.

C) I APPROVED THE CAP ON THE BASIS THAT NOTHING WOULD HAPPEN UNTIL 1 OF 7 TRIGGERS CHOSEN WOULD OCCUR.

D) THEN THERE WOULD BE CONVERSATIONS BETWEEN OUR COMMUNITY AND COUNCIL AS TO WHAT NEXT.

E) I SUPPORT AND HAVE DONE FROM DAY 1 TO FOCUS ON OUR FIRST LINE OF DEFENCE FROM THE SEA, I HAVE PAID THE ADDITIONAL LEVY RATE TO KEEP MAINTAIN AND RENOURISH THE BUND WHICH GETS MORE EXPENSIVE YEAR ON YEAR.

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

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

✓ AS I STATED EARLIER I FULLY
OPPOSE PCT IN ITS ENTIRETY.

I BELIEVE THE COUNCIL NEED
TO RETHINK THIS WHOLE PROPOSAL
AND THE PROCESS.

MY BIGGEST CONCERN IS THE LACK
OF ENGAGEMENT WITH SHARING
AND CONSULTING WITH OUR BEACH
COMMUNITY.

THE NEED FOR MORE MEANINGFUL
ENGAGEMENT TO MAKE DECISIONS
TOGETHER WITH COUNCIL RATHER
THAN COUNCIL LEADING THE
PROCESS.

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:

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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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:

21.08.26

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)

Megan + David Latham

Contact person:

Megan Latham

Designation:

Home Owner

Address for service:

18 Grierson Ave
Amberley Beach

Email address:

meg-dave@hotmail.com

Telephone:

027 8505640

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:

the proposed rezoning to the whole
Plan Change 7 - Rosewood
Terrace

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

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

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

see 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 ☒

I oppose Plan Change 7 – Rosewood Terrace in its current form.

I do not oppose responsible long-term planning for natural hazards. Nor do I oppose Council engaging with Amberley Beach residents about future options. However, I oppose this plan change because it is premature, insufficiently certain, and does not provide adequate protection for a small and vulnerable coastal community that may be materially affected by the proposal.

The notified material identifies a broad purpose of enabling the proactive relocation of the Amberley Beach settlement. However, the proposal does not provide sufficient certainty about what relocation means in practice, when it would occur, whether it would be voluntary, what would trigger it, who would pay for it, how residents would be protected, and whether the existing Amberley Beach community would be preserved.

The effect is that a small community is being asked to respond to a major rezoning proposal without being given sufficient practical certainty about the consequences. That is not a fair or adequate basis for a plan change of this significance.

Reasons for opposition

1. The proposal creates uncertainty for a tiny established community

Amberley Beach is a small, established community. It is not simply a planning unit or a collection of individual properties. It is a community with its own identity, history, social connections, neighbour relationships and local character.

The proposal is said to enable the proactive relocation of that settlement. That is a significant proposition. Relocation of a community is not a minor planning adjustment. It has consequences for people's homes, finances, choices, identity, security, wellbeing and connection to place.

The plan change does not adequately address those human and community impacts. In its present form, it risks reducing the issue to a technical rezoning

exercise, when in reality it concerns the possible future displacement or relocation of an existing settlement.

The proposal should not proceed unless and until Council has provided a clear, community-focused relocation framework that explains exactly what is proposed, when it would occur, what rights residents would have, and how the existing community would be protected.

2. There are no sufficiently clear relocation triggers

A central weakness of the proposal is the absence of clear, objective and enforceable relocation triggers.

The plan change is advanced on the basis of enabling relocation due to natural hazard risk. However, residents need to know what specific circumstances would cause Council to move from “planning for a possible future option” to actively promoting, facilitating, requiring, or expecting relocation.

The plan change should not proceed on the basis of vague or general references to future hazard risk. If relocation is contemplated, the triggers must be precise. They should identify:

1. what level of coastal erosion would trigger action;
2. what level of inundation, flooding or groundwater risk would trigger action;
3. whether infrastructure failure would trigger action;
4. whether insurance withdrawal or access difficulty would trigger action;
5. whether a formal Council resolution would be required;
6. whether independent expert evidence would be required;
7. what consultation would occur before any decision was made;
8. whether individual properties or the whole settlement would be affected; and
9. whether relocation would be voluntary or compulsory.

Without those matters being clearly defined, the plan change creates uncertainty rather than resolving it.

3. The proposal is unclear on whether relocation is voluntary or compulsory

The notified material refers to proactive relocation. It does not sufficiently explain whether relocation would be voluntary, encouraged, incentivised, expected, or required.

That distinction is fundamental.

If relocation is voluntary, the proposal should say so clearly. If there are circumstances where relocation could become compulsory or practically unavoidable, the legal basis, threshold, decision-maker and process must be clearly identified.

Residents should not be left in a position where the rezoning creates uncertainty about whether their remaining at Amberley Beach is supported, discouraged, or time-limited. Nor should residents be left to infer that relocation is inevitable simply because Council has rezoned land elsewhere.

This is particularly concerning for a small community, where uncertainty itself may affect property values, insurance, investment decisions, maintenance decisions, emotional security, and long-term planning.

4. The costs are not sufficiently clear

A major reason for opposing the plan change in its present form is the lack of clear information about cost.

The notified material states that the purpose of the plan change includes enabling relocation in a manner that is cost neutral to the wider community. However, that statement does not answer the key practical questions for affected residents.

The proposal should clearly explain:

1. who will pay for the development infrastructure;
2. who will pay for road access, water, wastewater, stormwater and other servicing;
3. whether development contributions will apply;
4. whether affected residents will be required to purchase new sections at market value;
5. whether any subsidy, credit, compensation, land-swap, staged payment, or affordability mechanism is proposed;
6. whether rates will increase;
7. whether there will be additional targeted rates or charges;
8. whether relocation costs will fall on individual residents;

9. whether older residents or fixed-income residents will be protected; and
10. how “cost neutral to the wider community” will be achieved without transferring unfair costs onto the residents most affected.

A plan change that is intended to facilitate relocation should not proceed unless residents can understand the financial consequences. A relocation pathway that is technically available but financially inaccessible is not a genuine solution.

5. Risk of unfair cost transfer to affected residents

The phrase “cost neutral to the wider community” may be understandable from a district-wide rating perspective. However, it raises a serious concern: cost neutrality for the wider community may simply mean that the costs are shifted onto the very residents facing the hazard risk.

That would be unfair.

If Amberley Beach residents are expected to fund new sections, new services, moving costs, connection costs, legal costs, financing costs, rating changes or development contributions, then the proposal may impose a substantial burden on a small community.

The plan change should not be approved unless Council can demonstrate that the financial model is fair, transparent and realistic for the affected residents.

6. The proposal may fragment the existing community

The plan change appears to create residential development capacity, but it does not sufficiently guarantee that Amberley Beach residents will be able to relocate together, or substantially together, if relocation occurs.

That is a significant weakness.

A small community can be lost if residents are dealt with as separate purchasers or individual market participants. If sections are made available to the general market without priority, staging or allocation protections, existing residents may be priced out or dispersed.

The proposal should not proceed unless it includes a clear obligation to preserve community continuity. That should include:

1. priority access for Amberley Beach residents;
2. an allocation process that recognises the existing community;
3. staging that allows groups of residents to relocate at similar times;

4. affordability safeguards;
5. design that supports neighbour relationships and accessibility;
6. specific recognition of older, vulnerable and fixed-income residents; and
7. consultation with residents before any allocation or staging decisions are made.

Without those protections, the proposal risks facilitating the disappearance of Amberley Beach as a community.

7. The proposal may create planning and market pressure before relocation is justified

Approving the plan change may create an assumption that relocation is the preferred or inevitable outcome, even if no clear trigger has been met.

That could have unintended consequences. It may affect how residents, insurers, purchasers, lenders and others view existing Amberley Beach properties. It may discourage investment in maintenance or improvements. It may create uncertainty for residents who wish to remain.

That is a substantial concern. The Council should not approve a rezoning that may alter the status or perception of the existing settlement without also creating clear protections for residents.

8. The proposal is premature without an implementation framework

The plan change should not be approved ahead of a clear implementation framework.

Before rezoning is confirmed, Council should first identify:

1. the relocation triggers;
2. the evidence base;
3. the consultation pathway;
4. whether relocation is voluntary;
5. who pays;
6. how residents will be protected;
7. how lots will be allocated;
8. whether residents will receive priority;

9. how affordability will be addressed;
10. how the existing community will be preserved;
11. what happens to properties at Amberley Beach; and
12. how ongoing uncertainty will be managed.

Without that framework, the proposal is premature.

9. The scale and character of the development require careful scrutiny

The Form 5 material records that the rezoning would enable approximately 230 residential lots. That is a significant residential development. It should not be justified solely by reference to future relocation unless there is a clear mechanism showing that it will, in fact, serve the needs of Amberley Beach residents.

If the development proceeds mainly as an ordinary residential subdivision, rather than as a protected relocation pathway, then the planning justification requires close scrutiny.

Council should be satisfied that the scale, staging, layout, servicing and allocation of the development genuinely align with the stated relocation purpose. If that connection is not secured, the rezoning risks becoming a general residential growth proposal using Amberley Beach relocation as its justification.

10. The plan change lacks adequate safeguards for vulnerable residents

Any relocation-related proposal must expressly consider the position of vulnerable residents. That includes older residents, people on fixed incomes, people with limited savings, people with health or mobility issues, and people who may not be able to finance a new section or dwelling.

A technically available relocation option is not sufficient if the people most affected cannot access it.

The plan change should not be approved unless it includes safeguards to ensure that vulnerable members of the Amberley Beach community are not left worse off, priced out, or forced into uncertainty.

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

I seek that Hurunui District Council decline Plan Change 7 – Rosewood Terrace in its current form.

In the alternative, if Council is minded to approve the plan change, I seek that it be substantially amended before approval.

In particular, I seek the following decision:

1. Decline Plan Change 7 as currently notified.
2. Alternatively, defer approval until Council has prepared and consulted on a full relocation implementation framework for Amberley Beach residents.
3. Require Council to clearly state whether relocation is voluntary or compulsory.
4. Require Council to identify the legal basis, process and threshold for any non-voluntary relocation step, if any such step is contemplated.
5. Require clear, objective and evidence-based relocation triggers before any relocation process can be initiated, recommended, facilitated or materially advanced.
6. Require that any relocation trigger be based on current independent technical evidence and publicly available reporting.
7. Require direct consultation with Amberley Beach residents before any relocation pathway is activated.
8. Require Council to publish a full cost framework before the plan change is approved or implemented.
9. Require Council to identify who will pay for infrastructure, servicing, development contributions, moving costs, legal costs, connection costs, rating impacts and any other financial consequences.
10. Require Council to explain how the proposal will be “cost neutral to the wider community” without unfairly transferring costs to Amberley Beach residents.
11. Require an affordability framework for affected residents, including older residents, vulnerable residents and residents on fixed incomes.
12. Require priority access or a protected allocation pathway for existing Amberley Beach residents if the Rosewood Terrace land is to be relied on for relocation.
13. Prevent the Rosewood Terrace development from proceeding as a general market subdivision unless and until the needs of Amberley Beach residents have been properly addressed.
14. Require staging provisions that allow Amberley Beach residents to relocate together, or substantially together, where they wish to do so.
15. Require binding or formally adopted provisions to protect the continuity of the existing Amberley Beach community.



16. Require further consultation with Amberley Beach residents on the Outline Development Plan, lot allocation, staging, affordability, infrastructure, reserves, access and community facilities.
17. Require Council to identify what will happen to existing Amberley Beach properties if relocation occurs.
18. Require Council to identify how uncertainty for current residents will be avoided or mitigated.
19. Require any amended plan change to expressly state that rezoning does not, of itself, mean that relocation has been determined, required or triggered.
20. Make any further, alternative or consequential amendments necessary to address the concerns raised in this submission.

From: tgoulding@xtra.co.nz <tgoulding@xtra.co.nz>
Sent: 21 August 2026 09:28
To: Planning <planning@hurunui.govt.nz>
Subject: Submission opposing proposed Plan Change PC7

You don't often get email from tgoulding@xtra.co.nz. [Learn why this is important](#)

Hello

I am Tim Goulding and below is my submission opposing Hurunui District Council Plan Change PC7.

Please acknowledge receipt of this submission.

Thanks

Tim Goulding

0274722555

Submission opposing Hurunui District Council Plan Change PC7

Submitter: Timothy John Goulding. I am an equitable owner of 4 South Cres Amberley Beach - My wife and I are principal beneficiaries of the Lisieux Trust which owns the property at 4 South Cres Amberley Beach. We and our children are the main occupants. I am authorised by the Trustee to make this submission.

I wish to be heard in support of this submission. I have no trade interest .

I oppose Plan Change PC7 and require that it be declined.

These are my reasons in summary:

- PC7 does not manage hazard risk at Amberley Beach in a proportionate way
- PC& does not follow the dynamic pathways approach set out in the CAP* and in the PMRLB*. Specifically, and critically, plan change is to only take place **after** triggers are met under the CAP . This is absolutely fundamental in the prescribed adaptive planning.
- PC7 is premature by many years and may never be needed
- HDC has not accessed , indeed has resisted, current data and science and evidence to support its PC7 application. HDC has not critically reviewed and assessed the now dated and non-peer-reviewed Jacobs Report . HDC has ignored or discounted a Ministerial directive in regard to non-reliance on extreme projections as adopted in the Jacobs Report.

- PC7 does not follow the trigger-based procedure set out in the CAP. It distorts the sequential methodology laid down in both the CAP and PMRLB* and thereby distorts the outcomes to the Amberley Beach [“AB”] community.
- By proceeding with Plan change and subdivision for managed relocation before trigger point based thresholds under the CAP are reached, PC7 surreptitiously predetermines pathways under the CAP thereby undermining the dynamic pathways approach of the CAP
- The retrospective reliance on PMRLB which predates the CAP is another critical breach of the dynamic pathways forward-looking planning methodology of the CAP.
- PC7 exhibits a nuanced and inconsistent approach by HDC to hazard management across its jurisdiction with markedly different solutions proposed for other coastal communities eg Gore Bay, Leithfield Beach, Motunau. Within the parameters of different environmental factors, HDC must be consistent in its hazard risk mitigation
- PC7 does not factor in the resilience of the Beach environment and the Beach community to meeting natural hazards.
- PC7 will cause Immediate and direct loss to my property and the other properties at the Beach by steering the settlement into a retreat pathway which PC7 will activate. PC7 will result in the elimination of other relief such as better mitigation of hazards and compensation and insurance options. I and most AB Owners do not agree to this.
- The s32 Report and EIA incorrectly state the financial costs to date incurred by HDC in protection measures at AB, thereby overstating the case for PC7. There is no acknowledgement of the fact that AB ratepayers fund the bund by levy.
- PC7, the s32 Report and the EIA make critical incorrect assumptions that ‘key requirements’ of the AB settlement are that it be relocated in one location, near the coast, and proximate to the existing location. The coastal footprint cannot be repeated and these ‘key requirements’ are contrived by HDC to justify PC7.
- The bund and other forms of revetment are downplayed, whereas they are the primary mitigation tools and can be enhanced and refined by advancing technology – far more cost effective for AB Owners than managed relocation and obviate the need for PC7
- The inevitable downstream effect of PC7 will be to cause substantial financial loss to AB Owners, and that loss is downplayed in s32 Report and EIA
- PC7 facilitates a substantial regular residential subdivision for the public contrary to HDC planning with only a remote potential uptake from AB owners, so the prime reason for plan change is remote or unlikely. HDC has done inadequate preliminary research to ascertain likely uptake by AB owners.
- Fluvial and pluvial risks have been effectively mitigated by stormwater diversion [Stanton Rd] and periodic Mimimoto Lagoon opening thereby significantly reducing hazard risk at AB. This has not been factored in to the risk equation underpinning PC7
- The momentous and revolutionary remedy of managed relocation and its impact on property rights and enjoyment demand a heightened duty of care and assessment of risk which has not occurred in the promulgating PC7 by HDC.
- HDC should not be engaging in speculative development which PC7 enables– it is outside its core role as a Council
- Creating another urban enclave in the countryside adjoining State Highway 1 is undesirable from a planning point of view especially when it is between two towns (Leithfield and Amberley) . only 5km apart. It will create something akin to ‘ribbon development’.
- There has been poor and inadequate consultation with the AB Owners and community who are the ones principally affected by PC7
- The detail of the managed relocation section uptake and consequences have not been worked through. This should have been a condition precedent of PC7.
- HDC and consultants failed to disclose in PC7 or the s32 Report the letter to NZ councils of June 2026 by Hon Simon Watts, Minister of Climate Change, cautioning councils against embarking on projects based on high-end emissions scenarios and constructing infrastructure designed around worst-case scenarios.

- A 230 lot subdivision by its scale ipso facto overrides the dominant purpose of the Plan Change to provide relocation sections [which will be maximum 109 sections and likely much less – substantially less than half of the sections created].
- PC7 is classic “tail wagging the dog” – driven by HDC agenda, HDC loan access, HDC desire for more housing, HDC desire to set a climate change precedent. rather than by the need for managed relocation or the need for a large subdivision at Rosewood location.

Relief sought:

1. **PC7 be declined**
2. **Proper maintenance and enhancement and extension of the AB bund be committed to by HDC**
3. **Rock revetment be approved for AB as it was for Gore Bay as the preferred risk management tool rather than managed relocation**
4. **Other risk mitigation initiatives be undertaken eg opening the direct Waipara River outlet to the ocean and controlling shingle removal from Waipara River**
5. **A review in conjunction with the AB community be undertaken of the CAP especially its trigger points**

Note - CAP means the Amberley Beach Coastal Adaptation Plan of June 2023

PMRLB means Amberley Beach Proposal for Managed Retreat and Land Banking of March 2023

AB means Amberley Beach

Jacobs Report means the report by Jacobs Consultants of 2020 commissioned by HDC