Submission on Plan Change 7 – Rosewood Terrace

To: Hurunui District Council
Attention: Planning Team
Subject: Submission in Opposition to Plan Change 7 – Rosewood Terrace
Submitter: Paula Le Compte
Address for service: 33 Chamberlain Avenue, Amberley Beach
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Phone: 021 850 594
I wish to be heard in support of my submission: Yes
If others make a similar submission, I will consider presenting a joint case: Yes

The specific provisions of the proposal that my submission relates to in opposition of Plan Change 7 – Rosewood Terrace, include:

a. To amend the planning maps to rezone part of the property at 185 Ashworths Road, Amberley, Lot 1 DP 36474, as shown at page 6 (the Plan Change Site), to Residential 1, and also apply an Outline Development Zone overlay.
b. To add a new policy (as Policy 4.32) in Chapter 4, to guide development in this area.
c. To add a new permitted activity standard to Rule 4.6.3 (Yards) to apply a minimum 5 yard from any boundary adjoining specified open space areas
d. To add a new permitted activity standard (as Rule 4.6.25) restricting buildings from being built in areas identified as being subject to slope stability risks.
e. To amend Rule 5.5.11.1(a)(ii), so that the general requirement for larger subdivisions to be undertaken in stages up to a maximum of 40 lots per stage, does not apply to the Plan Change Site.
f. To add a new rule (Rule 5.6.11) to require any subdivision within the Plan Change Site to be in general accordance with the ODP (5.6.11.1.1(a)); and to apply a non-complying activity status where this is not achieved (5.6.11.3); to require a planting plan, in general accordance with the Mitigation Planting Guidelines, to be submitted with any subdivision application (5.6.11.1.1(b)); and to outline additional matters of control applying to any future subdivision of the Plan Change Site (5.6.11.2).
g. To insert an Outline Development Plan (ODP) in Chapter 5 – Subdivision, as Appendix 5.1.19, as set out in Appendix A, which will guide the form of the development of the Plan Change Site.
h. To insert Mitigation Planting Guidelines in Chapter 5 – Subdivision, as Appendix 5.1.20, as set out in Appendix B, which will guide the details of the landscaping to be provided in identified areas.

Definitions used in this submission and their relevant links

HDC – The Hurunui District Council
CC - Coastal Conversations, hosted by HDC from 2020 to 2023 – undertaken at several Hurunui coastal communities, in this submission I only reference those for Amberley Beach https://www.hurunui.govt.nz/environment/coastal-conversations-in-the-hurunui/amberley-beach-3
Jacobs – Report dated May 6 2020 prepared for HDC – Hurunui District Coastline Hazard and Risk Assessment plus the Appendix Booklet dated March 5 2020
https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Regulatory_Services/Coastal_conversations/Amberley_Beach/Hurunui_District_Coastline_Hazard_and_Risk_Assessment.pdf
https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Regulatory_Services/Coastal_conversations/Amberley_Beach/Hurunui_District_Coastline_Hazard_and_Risk_Assessment_Appendix_booklet.pdf
DAPP – Dynamic Adaptive Policy Pathways a flexible decision making framework designed for deep uncertainty used by HDC in development of the CAP and how it would progress

Definitions used in this submission and their relevant links cont:

CAP – The Amberley Beach Coastal Adaptation Plan, as adopted by HDC in June 2023
https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Amberley%20Beach/Amberley%20Beach%20CAP%20-%20FINAL.pdf
PMRLB - Amberley Beach Proposal for Managed Retreat and Land Banking March 2023
https://www.hurunui.govt.nz/repository/libraries/id:23wyoavbi17q9ssstcjd/hierarchy/Regulatory_Services/Coastal_conversations/Amberley-Beach-Managed-Retreat-Proposal.pdf
PC7 – Plan Change 7 on which HDC has sought submissions, re-zoning sought from highly productive rural to residential 1 for 34 hectares of Rosewood Farm, to enable 230+ sections of 700m2 sections in a sub-division being referred to as Rosewood Terrace
Rosewood Terrace – the HDC proposed site of approximately 34 hectares of the 86.9 hectare Rosewood Farm property, on which HDC seek PC7. Rosewood Farm was purchased by HDC for $3.8 million in May/June 2025. HDC have advised they wish to sell the remaining land as quickly as possible, to reduce debt.
LGFA – New Zealand Local Government Funding Agency. HDC applied for and received a $23.5 million Green, Social & Sustainability (GSS) facility – under its Climate Change Adaptation category. This enabled payment for the purchase of Rosewood Farm. Approx $5 million has been drawdown, with the balance intended to fund the infrastructure for the proposed 230+ sections at the proposed satellite subdivision on Rosewood Terrace.

Personal Background & Introduction

I wish to commence my submission with some personal background.

My family own a property that was purchased in 1968 at 33 Chamberlain Avenue, Amberley Beach. Brought to provide a holiday home for my parents plus my brother and I, who were children at the time. It was a 2 storey, 2 bedroom weatherboard dwelling, with exterior stairs and an outdoor collection can toilet. The Beach community was already established from approx. 1950 onwards, on rented land from the Marine Dept. It was small close knit community which has evolved further over time, meeting the owners desire to live beside the sea. We were able to change from rental to freehold title. Sewage & town water supply connections were introduced. Upgraded over time, the initial bach was replaced with a more modern single level 3 bedroom dwelling, built by my brother. The property was then placed into a Family Trust for all future generations. It is the place where we stay on weekends, holidays & between other house locations over the years. The bach has also provided extended family with housing and a holiday destination. With the addition of grandchildren and now great grandchildren, this is a true kiwi holding right beside the sea for our entire family. It is a four generation family property, for my parents who are able bodied in their late 80s, thru to great grandchildren. My brother also has both built and renovated other properties located at the Beach.

We all enjoy having a family bach, especially where it is located being just a few seconds out the door to be beside the sea. We have the ability to tow a boat up along the coast & launch at the area known as The Rocks, which is beyond the Waipara River. The family spends time going to the close by Amberley Golf Club, using the tennis court and having fun within the Waipara River bed. We undertake fishing, diving, surfing & body boarding in the sea. The location enables us

to enjoy a beach lifestyle using various vehicular options, with a tractor, quads, golf cart and off road vehicles.

We have witnessed and benefited from the building in 1992 of the seawall known as the Bund which was extended in a later renourishment. The bund was most recently fully renourished and upgraded in January-March 2025, with a wider more inland base. Beach property owners fund the bund through a rated levy, paid in addition to their HDC rates. It is collected by HDC for the purpose of the bund renourishment. This arrangement is unique to the Beach, as the bund sits on a HDC Reserve and while it is not owned, it is resident funded.

I have personally been involved on the Amberley Beach Residents & Ratepayers Community (ABRRaC) becoming a member of the committee several years ago. The group has worked on behalf of the community on numerous issues. The biggest focus has been on the bund and ensuring the on-going maintenance.

Involvement with the Coastal Conversations (CC)

Both my parents and I have been involved in the CC held by HDC since they started in 2020, which saw the development over time, of the CAP. These discussions were based on the risks identified in the Jacobs report with modelling based on IPCC figures with the extreme of RPC 8.5 & 8.5+. Modelling was used to try to predicate out 100 years, covering fluvial & pluvial perceived risks along with Sea Level Rise (SLR) potentially causing coastal inundation. We, along with other community members, challenged many of those Jacobs assumptions.

The PMRLB was also formulated, dated March 2023. Consultation with the Amberley Beach community had been built up over time, planning was by using DAPP. The CAP was developed with a range of triggers, that would generate further discussion and agreement for outcomes in the future. The HDC has undertaken only one survey, with 40 responses of which only 29 (or 25% of the 109 households) indicated support for land banking.

For this submission I wish to quote that survey in full, for the following reasons:

1. It has been used as the basis to proceed with a land purchase, not the steps laid out in the CAP and PMRLB
2. Despite several requests, HDC has been adamant they cannot utilise the email/postal database of addresses held for rating notices, saying that they can only be used for rating notifications. This is despite a significant future impacting decision process occurring that directly influences the properties at the Beach current and future value.
3. HDC sought no other way to make direct contact, to enable it to have the full engagement of the community, a failure of democracy and consultation in my opinion.
4. It is possible that both the purchase of Rosewood Farm and the LGFA facility leading to the current proposed PC7 on which I am submitting, would have never even progressed, if more appropriate consultation had taken place.

The HDC indication of intertest survey stated the following:

PROPOSAL FOR MANAGED RETREAT AND LAND BANKING

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

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

Choose One

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

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

From this, only 25% of the 109 property owners indicated agreement in principal.

The CAP and specifically the PMRLB discussions were understood by the community to be a concept, with the further understanding that all steps required on-going consultation and agreement. The development of the CAP and the use of DAPP meant steps or triggers could be reviewed when and as required, changed as needs arose, or as science developed.

The PMRLB proposal also indicated only a 200 section concept - if the final step of managed retreat was ever needed for the 109 property titles, with the additional 91 sections to then be sold off to fund infrastructure costs, with a land banking purchase of $1 million.

The agreed first priority from the CC and the CAP, was the renewal of the already existing bund ECan Resource Consent and a further more inland renourishment. This was undertaken with CRC232136 issued by ECan to HDC on 8 March 2023, expiring 8 March 2053. The physical renourishment finally took place in January – March 2025.

Prior and parallel, after a 2008 stormwater flood event that impacted both Amberley township and Amberley Beach, an "Amberley Stormwater Management Strategy" to manage drainage as an integrated network was developed by HDC. They purchased the Amberley Swamp and set up the Stanton Road diversion weir in 2025.

The CAP has not been reviewed nor the Jacobs report it relies upon, since these stormwater flood prevention actions took place. Between the Stanton Road weir diverting water away from Amberley township and therefore down to Amberley Beach, the pluvial and fluvial risks of the Jacobs Report are now potentially overstated. However a request for a peer review of the report was declined by HDC. Combined with the amended modelling, the projected Sea Level Rise by Jacobs is also highly speculative. Again a request by ABRRaC for an independent review was declined by HDC.

Reasons For My Opposition to Plan Change 7

I oppose the proposed plan change and will endeavour to explain the reasons why, under several different headings.

Funding and Process

The Amberley Beach community via ABRRaC has sought a review of the CAP and triggers for some time. The CAP utilised DAPP, but this has not been followed. HDC have continued to push forward without the agreement of the community or the surrounding farm land owners. This is while still maintaining the claim that they purchased Rosewood Farm for the Beach community, which was advised via the media. They state it was on a no regrets basis, for land banking for a potential a managed retreat often also referred to as a proactive retreat,
Further to the land purchase, the community was then advised again via the media, that HDC had obtained a $23.5 millon funding facility thru LGNZ, being a LGFA green loan to both pay for the land purchase & legal costs, plus planning costs for a zone change. I understand that $5.5 million has been drawn down already, to cover the $3.8 million land purchase. The $23.5 million facility is for 10 years with the balance to be used for the infrastructure.

The Hurunui District ratepayers were not consulted on this debt funding, nor did it form part of the Long Term Plan. When did HDC become a property developer? They are progressing towards being "in trade" which is not the purpose of Local Government. PC7 is now further undermining the use of the DAPP process in the CAP.
The relevance and worth of the CAP is now questionable.

Community Agreement

The material advises that the stated purpose of PC7, is to enable the proactive relocation of the Amberley Beach settlement of some 109 titles, due to multiple hazards including coastal erosion and inundation, fluvial and pluvial flooding and rising groundwater.

As stated earlier, both the CAP & PMRLB were developed for community led decision making, when triggered. No triggers have been reached, no agreement from the community to undertake a purchase for land banking was sought, nor was there agreement on the subsequent LGFA funding obtained. At both the July 2025 and 20 July 2026 HDC public information meetings, strong opposition has been voiced.
The assessments do allude to this unknown factor of take up. How can PC7 be applied for with the unknown component of voluntary uptake?

Scale

The HDC Section 32 material records that PC7 concerns the rezoning of a portion of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone. The Outline Development Zone overlay with associated changes, indicates that if successful the rezoning would enable approximately 230 plus residential lots of 700m2 to be developed.

This differs from the PMRLB scale of 200 sections, with 109 for the beach and 91 for sale to facilitate funding. This increase in scale is effectively diluting further the community, to less than 50%, if all 109 beach property owners took up the option.

If less take up the option, those who do are even more dispersed within the 230+ proposed sections. So therefore is this really even for Amberley Beach?
Any ballot process definition is yet to be determined, those who may take up the offer could be intermingled and therefore no community feel would therefore be retained.

HDC Ratepayers Liability

Without either Beach resident or HDC ratepayer agreement on the Rosewood Farm purchase, we are now in a situation where a district, not just the Beach property owners, must make a decision on PC7 that contradicts the HDCs own District Plan over no further conversion of productive land.
PC7 also does not follow The National Policy Statement for Highly Productive Land 2022 (NPS-HPL) (Amended 2025). Combined with the LGFA funding facility (if fully drawdown to speculate on the subdivision) the debt funding places interest payment liability on all ratepayers. It places speculation of HDC being "in trade" by undertaking the sale of an unknown number of sections, in the proposed satellite subdivision.
The expected sale price in the assessments does not reflect the reality of the site location, being somewhat isolated away from the Amberley township and its facilities, with the price more aligned with the expectations of being within the town boundary.

This level of debt was not part of the Long Term Plan, nor were Councillors given mandate by the District to proceed with this scale of a commercial business venture. HDC is undertaking PC7 against their own policy and also that of the NPS-HPL.

CAP Triggers

The land purchase was and is premature, it has not been triggered in terms of the CAP or with the use of the DAPP. The proposed location is on highly productive farm land, the PC7 now seeks to change this to residential. PC7 does not follow the process outlined in the PMRLB
The surrounding area will still remain productive farm land and will be operating in that manner. The rural property owners have not been consulted about the impact of having a satellite subdivision created amongst them. Their concerns and the impact on their properties and lifestyle is not addressed in the assessments. On 8 June 2026, 14 neighbouring rural properties wrote to HDC opposing the land purchase.

Even if purchased for the purpose of land banking, there is no requirement to change the zoning until the agreed triggers have occurred, as the land may never even be required.
The CAP & PMRLB spoke to this, with return of monies paid if the land banking was not needed. There is no consideration of the impact on those living in the immediate rural area surrounding the proposed Rosewood Terrace. Years of site development with noise, dust and interruption to quality of life are not assessed or included.

Engagement Rigour

The effect of PC7 is that a small beach community is being asked to respond to a major rezoning proposal for some 34 hectares of the now HDC owned and leased 87 hectare Rosewood Farm. The notification material talks of a proactive relocation, yet none of the detail of this process has been fully discussed or even agreed to by the beach community. After the June 2023 CAP adoption by the Council, meaningful engagement virtually ceased.

The HDC 2024 Awards have not in the eyes of the Beach Community, stood the rigour of time since the CAP development.
The size of the portion of land at Rosewood has increased, to meet technical requirements about boundary distances and perceived slope risk on the Hursley Terrace edge. Public meetings in July 2025 and July 2026 have passed on information on what has happened or is in the process of happening as in PC7. Neither of these public sessions have seen negotiated outcomes with the community view being actually considered. The only concession was an extension by 2 weeks in the timeframe for PC7 submissions.
It is noted that should PC7 be approved, "Councillors will then decide when the subdivision will happen". No agreement was ever reached on a viable number in agreement to land banking, the Council has taken over deciding the process of <u>not only where, but also when</u>.

<u>Financial</u>

On announcing the land purchase, it was subsequently revealed that $3.8 million had been paid for the Rosewood Farm, which exceeded the $1 million price alluded to for land banking in the PMRLB. From mid 2023 to mid 2026 the concept has then also evolved in scale, with the proposed Beach community a maximum of 109 in the now planned 230+ section sub-division – that is a ratio of less than 50%. Relocation has been advised as "an option", so the uptake and costings in the assessments are not based on any factual numbers, but with an expectation that all 109 properties at the Beach would enter into a land purchase contract with HDC for $11,000. Opposition to the concept is not fully considered in my opinion.

The financial assumptions in the assessments do not reflect this unknown number of uptake. The HDC CEO has publicly stated the concept will proceed, even if only ONE beach property agreed. In no way does this reflect the intent and understanding of the CAP or the PMRLB.
The LGFA funding facility was based on the CAP and the perceived community need to relocate – however this was not agreed with the residents. The assessments include an approx. $8,000 Council Contribution in addition to the purchase price of $11,000.
The financial exposure of the residents is not considered, having 2 rateable properties plus considerable expense in undertaking the building of a new dwelling or in a few cases, relocation of an existing dwelling. The section left at the Beach must then also be completely cleared, at the residents expense.

<u>Speculation on Amberley Township Growth Demand</u>

There are already several developments underway within the Amberley township to absorb future growth, which include the balance of Oakfields, the other stages of The Clearing, the further units, apartments and a hospice at The Amberley Country Estate and the most recent being the approval of Murchison Homes subdivision on Amberley Beach Road.
Creating a further satellite subdivision, located away from the Amberley township does not guarantee sales of the surplus sections. Earlier assertations of other communities needing a portion of the land have not been included anywhere in PC7 or any alluded to "social housing".

There is no agreed timeline or even any CAP event triggered, to warrant this speculative development being undertaken by the Council.

Dwellings

It has been indicated that dwellings that would be able to be re-located from the Beach, could be moved and re-established on approved foundations at the proposed site, rather than a full new build. On questioning, it was stated that if already consented, they would not need to comply with current Build Code. This would conflict with the requirements placed on other potential external property purchasers, who under current build consent conditions would need to be "built to code". It was also stated that tiny homes could be installed.

These are speculative opinions and would be subject to regulatory control eg from MBIE. It is also highly unlikely that other purchasers of the $230,000 plus valued sections, would be mindful to build alongside much lesser value relocated houses or tiny homes.

Roading

The assessments do not address the narrow rural road nature of Hursley Terrace Road, which is a Collector Road/Rural Connector. PC7 would see greatly increased traffic movement on Hursley Terrace Rd, both to the Amberley Township and to get down from Rosewood Terrace to the beach, either river and to the golf club. Considerable expense to improve the road would be required. There are no footpaths or cycleways.
Newcombe Road being closest access road to get to the Beach, is an unsealed narrow road and unsuitable for increased traffic.
Recently NZTA undertook to reduce speed on SH1 and turning ability southbound at the Kowai River entry to Leithfield Village, a known danger spot. The same traffic situation of an access road to and from the proposed sub-division, onto the 100kmh SH1on Ashworths Road creates the same risks.

The assessment does not seem to include the increased traffic volumes of 230 plus properties, likely to have 2 cars per property, undertaking daily movement as there are no facilities in this proposed satellite sub-division.

Location

The land on which PC7 is proposed, is on a clay bank terrace of Rosewood Farm, some 7km away as a satellite sub-division from the main township of Amberley. The land is adjacent to other active farms, which will continue to operate as farms with animals, noise and associated smells, spraying etc. The aspect is open to winds predominantly from the North West and North East, with a view out over the pivot irrigation system utilised by HDC at the wastewater treatment plant. The sea view is minimal with the assessments calling it "viewing corridors". The sea is distant and the view is restricted to only those on the terrace edge. Over time this outlook would likely be reduced further with tree planting to stabilise the terrace edge, but also forestry on the land in the lower area. The proposal creates uncertainty for an established community such as Amberley Beach, which is a small, coastal community with a mix of privately owned owner occupied dwellings and bach holdings, while some are ijnvedstment/rental properties which are all able to easily access the sea and waterways. There is a mixture of age of the dwellings and sizes. Very few could be "relocated" to the proposed land change area, due to the nature of construction and materials used.
People have purchased with the intent and purpose of being close to the sea and all it provides. The current location has some close to the sea and bund, others nearby but with a rural outlook.

There are lagoons at either end of the settlement, so combined with walking distance of 1 – 3 minutes to the beach front, or to either lagoon so residents have easy access to water features. Life by the water is predominant reason to be there. In the centre is a split north & south camping ground with a playground & tennis court, plus the community centre. There is a further reserve with another playground and a community garden area. The Beach has its own unique history, social connections, neighbourly relationships and local character. Some are modern homes, others renovated while mixed in amongst older quite original kiwi "bachs". Nearby is the Amberley Golf Club.

The loss of amenity of being a coastal community is not addressed at all by the assessment material. Taking the literal proposal to do a proactive relocation of the settlement means that the community suffers the loss of beachside living, character and immediate access to waterways.
None of those lifestyle features and recreational outlets important to well-being even exist at the proposed plan change site, there are no water features at all or even any waterways, other than a normally dry floodwater gully from the distant Amberley township running down to Hursley Terrace.

Timeline

The Plan Change documentation includes assessments that anticipate all Beach property owners taking up the option. Those assessments infer that development of the infrastructure is to commence imminently – what has happened even to the concept of land purchase for land banking? The property owners are therefore being asked to make a decision to be included or not, **NOW**, rather than in the future if and when any of the CAP triggers are reached. Those CAP triggers were to start a conversation - at that future time.

Instead it appears the process has leap frogged into a full blown satellite subdivision that defies the HDC's own District Plan, in not converting any further productive farmland into residential.
Even the concept of the division off from the farm of the 34 hectares proposed would appear to present a challenge to the concept of then selling of the rest of the un-needed farmland – as the proposed road corridor out to the Main North Road would divide the land even further, as it crosses right thru the farms centre.

Wellbeing

The relocation of the beach township to up onto a clay cliff area with the sea in the distance, does not bode well for the continued well-being of the community. The location is closer to the State Highway, with the sound of the beach to be replaced by heavy truck traffic 24 hours, as the Main South Island transport route . It is some distance to access any waterway, with the closest being the Kowai River, which often runs dry. There is no direct access to the beach. The estimated walking time via Newcombes Road would be 10-15 minutes, if driving there is no suitable parking at the end of the road.

The assessments do not fully include this loss of lifestyle & recreational access, nor do they consider the practicality of reaching the beach from this location. Both Newcombe & Kowai River Road are unsealed narrow rural roads. The impact on the property owners living

already on those roads has not been addressed, in both traffic movement and dust causing loss of enjoyment.

Financial Challenges

Combined with the other difficult financial decisions that are potentially required, this now assumed imminent proactive managed retreat is already having a major impact on the residents wellbeing. They are pressured by the potential loss and/or loss in value, of their existing home, bach or rental property. Many of the residents are seniors, who are not in the financial position to get or to further extend any mortgage facility to take on this huge upheaval. The clearance of the existing beach house and land would most likely extend their finances fully, with estimates from $60k upwards in cost. Their choice of where they see out their retirement or the rest of their holidays, is being questioned and options changed. Their identity of living life by the seaside is potentially gone, the reason they brought there, to hear the sea both day & night. The security they had in owning a dwelling is reduced, with the perceived value and insurability now questioned.

PC7 assumes relocation. It impacts future and current finances, with the need to not only buy a further section, to then potentially be paying rates on both before the undertaking the expense of building a new home, bach or a rental property. This is after also having to pay for building consent.
In addition there is also the cost of fully demolishing and clearing the land at the former property at the beach.
The value in their current property is being eroded by the media coverage, about the Beach being at risk, including when HDC won awards for their Adaptive Pathway planning and the Coastal Adaptation Plan. Insurance is likely to increase or potentially be limited in scope.

The proposal may fragment the existing community

The current beach community is small in scale and closely knit, the current sections are smaller than those proposed. Throughout the discussions on the land banking, no agreement was able to be made with HDC that the community could or would remain together, as a portion of the proposed relocation - if it were ever to even eventuate.
The difficult situation of making a “yes or no” decision, within a short time frame will inevitably place people in a situation of losing their long term neighbours and the associated support network. Even those who agree, could be on an extended timeframe and therefore fragmented in when they move, risking being scattered in amongst a large 230 section plus sub-division, surrounded with many undeveloped sections.

The community is faced with a potential situation of being fragmented, in addition to being divided by those who move and those who stay.

Existing Protection

PC7 does not adequately address in my opinion the very important individual and community impacts. It has become an exercise in removing HDC liability for the beach properties. The community already pays a levy for the renourishment of the bund, the priority defence to coastal inundation by storm wave. The ECan bund consent is thru until 2053, the CAP talks to more permanent material use being possible. The majority of the community feel protected where they currently reside, with the risks manageable. The investment to keep the bund in place is

already part of being in the community, those who have felt they are not happy to remain have already over time sold and moved away.

The pluvial and fluvial risk identified in the Jacobs report are in need of review as stated, being even more pertinent after the HDC Stanton Road Weir reduction of stormwater risk. This year the IPCC together with the current New Zealand Government, have now stated that the modelling based on the now implausible RCP8.5 & 8.5+ are to be reviewed.
This should have occurred before any move to PC7.

Infrastructure – Water & Wastewater

The speculative nature of the subdivision on Rosewood fails to take into consideration the costs of infrastructure fully. The Amberley township currently struggles to have sufficient fresh drinking water in periods of drought, while it continues to further expand with several hundred consented sections yet to be fully developed. There have been watering restrictions in the past. The Amberley Waste Water Treatment Plant (WWTP) is located below the proposed site and therefore fully visible. That same land on which WWTP is situated is therefore also realistically subject to the same perceived inundation risks over time, as those predicted by Jacobs in their 2020 report – which was not peer reviewed nor was the CAP.
Any further development at its current site, only makes the WWTP larger and therefore even more visible. I am unaware of what budget the WWT has for expansion in wastewater treatment, to even meet the increased demand as Amberley completes the development of already consented growth.

HDC has only recently entered into a water entity arrangement with Kaikoura, known as KHWS. The assessments do not indicate this new model. It is unknown if KHWS has scoped or budgeted for this satellite sub-division requirements, so new is the arrangement with its establishment in July 2026.

Options Reduced

HDC has made a presumptuous purchase, which they say was based on the belief people wanted to be close to the beach but not part of the Amberley township. This had not been discussed. They now state the purchase was on a "no regrets basis" The option to review where the community may wish to relocate to, has been potentially removed without consultation by the purchase of Rosewood Farm. What if a better located and preferred block of land became available and the Amberley Beach community stated they wanted that to be land banked for any potential future retreat?

PC7 commences a process that removes options – exactly the opposite of how DAPP was advised to give flexibility and options in the future as needs arose. It pre-determines a retreat, whether it is needed or not.
The uncertainty of whether the land will be needed at all should preclude a hasty PC7 land zone change from being undertaken at this time. If instead it is just "land banked", it can then remain as rural and could be sold if not required, or a more appropriate agreed location is sourced.

HDC responsibility to the District Ratepayers

This novel approach does not appear in the Long Term Plan, as it is currently debt funded. Whether the concept has been discussed with the new water entity Kaikoura Hurunui Water Services, is unknown – as is the situation with a proposed Council merger with Waimakariri. Therefore the costs and where they lie are not sufficiently clear at Council level, before contemplating them fully at an individual level.

Entering into a funding arrangement for a $23.5 million facility with LGFA has consequences for all Hurunui Ratepayers. Even if this was not to eventuate, there is no guarantee that HDC could recover the purchase cost of Rosewood Farm of $3.8 million, with further additional costs now also spent on planning.

Individual Financial Loss

Potential loss in value of existing property or the ability to either sell or insure are unknown factors for the Beach community. If this novel concept was to proceed, there is a risk at individual level of not being able to finance either the new build or a relocation - despite signing up an agreement. There is the cost to purchase at proposed site, if it is successfully rezoned, indicated at $11,000 plus approx. $8,000 contribution. The loss of equity in existing properties is stated to be offset by the vacant balloted section being stapled to the Beach title. However these cannot be split. So a sale of the beach property also sells the Rosewood Terrace section. Should the decision to build at Rosewood proceed, there is the necessary Building Consent, undertaking the actual building which is usually subject to inflation and costs exceeding budget, plus landscaping and fencing.

There are additional unknown costs impacted by inflation, followed closely by the required demolition and clearance of the beach property. For those with a property that could potentially be relocated, there is the cost of consenting of same, the cost of the physical lift, insurance for that move and the reinstatement to services, combined again with landscaping and fencing.

Without proper cost scenarios based on legal and quantity surveying opinion, for the individual there is a real risk of financial over commitment. Economic situations change, inflation impacts, an agreement made now could be impossible to meet and debt service in even 10 years time.

Risk of unfair future cost transfer to affected residents

The plan change supporting documentation refers to “cost neutral to the wider community”, which is taken to mean the Hurunui District. There are however many assumptions in that the cost neutrality is reached with the sale of all surplus sections, at a price not dis-similar to those within the Amberley community. Yet this is a satellite sub-division, some distance away from the actual township. There are no community amenities (e.g. retail,) other than greenspaces contemplated. So township prices, but without the same features, as in the ability to walk to the supermarket or to the hotel, to the Primary School or Library - all the normal township facilities. There is no fall back should the sale of surplus sections take time, as in years, as to where those financial liability costs then lie. What if 10 years passes from when the sub-division is built and a “fire sale” is needed to repay the LGFA funding, as moving to a Bank facility is likely to be at a much higher interest rate?

Where do all the ratepayers of Hurunui, or indeed in the future possible combined councils of Hurunui and Waimakariri see the debt funding interest cost being met? If the Councils do merge,

then the rate payers of both have an unknown liability. None of the assessments envisage the potential financial cost of holding an unknown quantity of unsold sections (valued at $230,000 for example) which would have interest cost needing to be met by rates.
There is no backup plan, the expected section sales are highly speculative and based on anticipated Amberley township growth. One could ask if the beach property owners are expected to contribute towards the potential Councils losses.
Are those who chose to remain at the Beach causing a higher amount of surplus sections needing to be sold, somehow more liable for the failure of the concept entered into by the Council? If the actual move from the Beach of those who do purchase is delayed, as it becomes apparent that there is no change in floodwater or coastal inundation risk, does the value of the sub-division reduce due to the level of unoccupied properties?
There are too many scenarios yet to be considered, discussed and agreed in a documented manner.

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

By seeking PC7 now, before any CAP trigger has been agreed to have been met, it appears that HDC are assuming and messaging, that it is an inevitable outcome that a retreat is imminent. This is not the case, instead the community has asked for a review of the CAP and the triggers, a review of the science on which the CAP is based. After all, it was the CAP that was used to obtain the LGFA facility.

The continued media publicity that HDC has undertaken, in the opinion of many in the community, has impacted the saleability of properties. It has reduced their value and has made owners hesitate on maintaining or improving their asset. The sense of the unknown has caused several to sell and depart, as the worry of what is possibly transpiring has impacted their well-being. Others who for genuine reasons may need to sell their property have this unknown scenario hanging over them, which is not justified,

The proposal is premature, without an implementation framework

There is a duty of care required to be shown by Council. After the opposition to the purchase of Rosewood Farm, HDC could have engaged and re-assessed whether the community felt it was ready to proceed fully into land banking. However by now going into the stage of undertaking PC7 to rezone, on the basis they wish to sell the surplus land, their actions would indicate this is a forgone conclusion that relocation is now needed and agreed. Again this is not the situation.
There is no need for HDC to undertake PC7 now. It is premature, discussion had contemplated the concept of land banking and not the imminent building of a 230+ section subdivision.

A more appropriate step could have been considered – a land banking exercise without the need to do anything more at this time. This could let the adaptative nature of the concept then be actually realised, in that it may not be the right location and/or it may not be required.
HDC have failed to follow the CAP processes they helped create and then adopted in June 2023, HDC have also failed to follow the process outlined in PMRLB.

The scale and character of the development requires careful scrutiny

The LGFA facility of $23.5 million was approved for the potential proactive relocation. However the material in the Form 5 is more focused on the scale of the development of the 230+ section subdivision, which is a large residential development. It is not within the Amberley township boundary and may therefore not be seen as desirable. Sales within the township itself have had periods of inactivity, there are yet to be developed approved areas already in progress.
There is no imminent need for the relocation of 109 Amberley Beach residents. If for example only 10 property owners indicated any interest, some 220 sections of the development become part of an outlying residential subdivision, that need to be sold. The whole concept becomes just another satellite sub division - rather than a relocation pathway as contemplated in the CAP and ultimately in the funding of $23.5m from LGFA.

Why would HDC contemplate becoming a property developer, when there is a focus on return to core services, rate freezes and amalgamations for cost efficiencies. Why would HDC move towards being "in trade" by becoming a property developer?
For many at the beach, this PC7 is not about any future potential relocation, but a scheme for potential growth speculation in the township.
However ultimately the location is less than ideal, the land is better purposed to remain as productive farmland, at this time.

PC7 lacks adequate safeguards for vulnerable residents

As stated previously, the potential costs of a proactive relocation are beyond the financial means of many of the beach residents. There are many older community members in retirement, people on fixed incomes without the financial means to finance a new section even at a low entry cost – let alone contemplate undertaking a new build. Some residents have health or mobility issues, there are also more young families in the community now who may well not have enough income to service any increase to their mortgage.

Those vulnerable residents see the loss of their current security in the future in their home or rental. These residents should not be undergoing this level of uncertainty, it is impacting their well-being.

Summary of my Opposition

- The initial land purchase, LGFA funding and PC7 assessments have been undertaken without the full and current agreement of all of the Beach community.
- PC7 is therefore presumptive of any scale of agreement by the community, along with the criteria for the application for the LGFA funding facility.
- The rezoning of productive farm land to residential contradicts the HDCs own District Plan.
- The surrounding rural property owners have not been considered or consulted.
- HDC is at potential risk of the jeopardy of becoming "in trade".

In March 2024, HDC received a New Zealand Planning Institute (NZPI) Best Practice Award for Climate Change, judged on collaborative planning framework to address SLR and coastal hazards alongside the local beach community, for the Amberley Beach CAP. They also received

an Excellence Awards Winner of Excellence in Community Engagement. Sadly, engagement has since become only a state of being informed, once actions have been unilaterally undertaken by HDC. To re-engage and justify those Awards, HDC needs to work with the Beach community.
Additionally and of equal significance, the IPCC advised in early 2026 that the modelling on which Jacobs based their report and hazard assessments, is now deemed "implausible".
Central Government via the Minister of Climate Change Simon Watts on 30 June 2026, wrote to local councils advising modelling be reviewed and I refer to his statements, which directly apply to the situation Amberley Beach finds itself in with HDC:

> Use a range of credible climate scenarios when assessing infrastructure and planning decisions, including medium and high-end scenarios.
> Clearly identify which scenario has been adopted as the primary planning assumption and explain why.
> Demonstration the additional costs associated with higher-end climate assumptions and disclose the impact on rates, debt and long term affordability.
> Prioritise adaptative pathways and stages investment approaches wherever practical, rather than defaulting to immediate construction of infrastructure designed solely around worst-case assumptions.

Clearly this now needs to be applied in this instance with PC7 and its assessments, they are not acknowledging these requirements.

I seek the following decision from the consent authority:

- I seek that HDC and the Consent authority not proceed at this time with PC7.
- Instead the land can be held for "land-banking purposes" pending an independent review of the science on which the CAP is based. This would use the modified more realistic potential modelling, instead of the extreme & now deemed implausible used by Jacobs.
- The community should then be re-engaged to discuss the ongoing suitability of the CAP and triggers, by utilising the known addresses (email/physical) of all ratepayers. This could be achieved by obtaining a dispensation, this matter is significant enough to bypass the policy referred to and relied upon to date by HDC, that has prevented them writing to all ratepayers on anything else "other than rates". The full inclusion of all property owners is warranted and must be undertaken.
- The good intent from CC started in 2020 needs to be brought back into focus, with joint ownership of the issues and process between both HDC and the Beach residents.

Once communication channels are properly established, then the following should occur:

- Consultation with all Amberley Beach residents on the CAP and triggers.
- Require Council to identify how uncertainty for current residents will be avoided or mitigated and work with residents to ensure Insurance cover is being able to be accessed by informing the Insurance Council of the bund renourishment etc.

Hearing
I wish to be heard in support of my submission: YES
If others make a similar submission, I will consider presenting a joint case with them at the hearing: YES



-----Original Message-----
From: George and Sue <georgekemp57@gmail.com>
Sent: Thursday, 20 August 2026 3:28 pm
To: CustomerServices <info@hurunui.govt.nz>
Subject: Submission to object to land rezoning of 185 Ashworths Road

[You don't often get email from georgekemp57@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Please find attached our submission to object to the proposed land rezoning at 185 Ashworths Road Amberley.

Submission objection to proposed rezoning of 185 Ashworth road Amberley.

We would like to object to the proposed rezoning of 185 Ashworths road from rural to residential.

We do not think this rural land should be rezoned for housing, we are loosing far too much farm land in the Amberley area already. This site is also way larger than necessary to rehouse any residents who wish to move from Amberley beach area should the coastal issues make it necessary.

We feel the purchase of this land has been done without due consultation with the beach residents or the wider community who may end up having to pay for it in the long run.

We know several families living down by the beach none of whom wish to leave or could afford to build new homes. It appears that the implementation pathway in the Coastal adaption plan which was developed and agreed upon in 2023 has not been followed.

We therefore request that the coucil decline the proposal to to rezone this land.

Submitted by Sue and George Kemp- Amberley residents

S.M Kemp



Submission 95

[redacted]

From: Scott Orpwood <scottorpwood89@gmail.com>
Sent: Thursday, 20 August 2026 7:32 pm
To: Planning <planning@hurunui.govt.nz>
Subject: Fwd: Hurunui District Council - Plan Change PC7

> You don't often get email from scottorpwood89@gmail.com. Learn why this is important

---------- Forwarded message ---------
From: <tgoulding@xtra.co.nz>
Date: Thu, 20 Aug 2026, 7:23 pm
Subject: Hurunui District Council - Plan Change PC7
To: <scottorpwood89@gmail.com>

Hi Scott

Suggested submission

Email it to

planning@hurunui.govt.nz

To Hurunui District Council

Re PC7 at Rosewood Farm

I am Scott Orpwood .I own the property at 8 South Crescent Amberley Beach where I have lived for over 20 years. I have a better knowledge of the Beach and Pegasus Bay coastline as most people.

I oppose Plan Change PC7.

It is predicated on the managed relocation of the Amberley Beach village which is premature.

It has not followed proper process. No trigger points have been reached.

No up to date science and data has been obtained and assessed to justify managed relocation.

Proper consultation with Amberley Beach property owners has not occurred.

Rosewood is an inappropriate location for another urban settlement – stuck out on a limb between Leithfield and Amberley. It will increase congestion ,traffic hazards and spoil the aesthetic farming landscape.

A 230 lot subdivision is a large scale development which exceeds in scale any relocation need. It will likely result in just a standard residential subdivision with few if any Amberley Beach owners taking up a section. This is contrary to the RMA. There is a significant time delay between subdivision and relocation section option [if it takes place at all].

Rosewood should remain rural and zoned accordingly.

Most Beach owners are not in favour – there are many other risk mitigation measures the Council and community can undertake to address any hazards.

I require that PC7 be declined. HDC can retain the Rosewood land if it desires for future action.

I would like to be heard.

Thank you.

Scott Orpwood

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 AUGUST 2026

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

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

Plan Change 7 – Rosewood Terrace

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

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

1. Submitter details:

Name/s: (Full name)

MARC EDWARD & TRACEY JOAN COULTHARD

Contact person: TRACEY	Designation: HOME OWNERS

Address for service:

26 HOLTON ROAD
AMBERLEY BEACH
AMBERLEY 7481

Email address: COULTHARD.MARC.TRACEY@XTRA.CO.NZ	Telephone: 027 222 3882 (TRACEY)

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

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

(a) Adversely affects the environment; and

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

☒ I am not a trade competitor

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

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

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

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 [X] NO [ ]

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

Submission Opposing Proposed Plan Change 7 – Rosewood Terrace

We oppose Proposed Plan Change 7.

We moved to Amberley Beach four years ago. When we purchased our home, we were not made aware that our property was considered to be at high coastal risk or that there was a plan that could significantly affect the future of our home and community.

Our first knowledge of the Coastal Adaptation Plan (CAP) was approximately four weeks after moving here, when we attended a community meeting simply to meet our new neighbours. The CAP was presented to us as a long-term, **trigger-based process**. Our understanding was that if one of the identified triggers was reached, Council and the community would then have a conversation about what should happen next.

That understanding was important to us when deciding to remain in and invest in our home and community.

The CAP itself confirms that the seven triggers were developed to determine when action is required. It states that when the first trigger is reached, Council will initiate a conversation about next steps, and when two triggers are reached, a formal decision on the next steps will be made.

To our knowledge, none of those seven triggers have been reached.

Yet Plan Change 7 is now proposing to rezone land at 185 Ashworths Road to Residential 1 and enable approximately 230 residential lots, with the stated purpose of facilitating the **proactive relocation of the Amberley Beach settlement**.

This appears to us to be a significant change from the process we understood and supported.

We accept that Council should prepare for future coastal risks. However, there is an important difference between **land banking and preparing for a possible future option**, and actively progressing a residential development specifically intended to facilitate relocation.

The Council's own Managed Retreat and Land Banking Proposal stated that managed retreat was **not required imminently**, that the land would be land-banked until required, and that the date it was required would be determined by the trigger points in the CAP. It also stated that there was **"no rush"** to complete the required Plan Change.

We therefore question why Plan Change 7 is being progressed now, before any of the agreed triggers have been reached and before the community has had the "conversation" about next steps that we understood the CAP to provide for.

We are also concerned that our community has previously requested a review of the CAP, yet this has not occurred. Given the significant change from the original process and the consequences of Plan Change 7, we believe a review should take place before further

progressing a proposal that could fundamentally affect our homes, property values, investment and community.

Amberley Beach is not simply a collection of houses that can be transferred elsewhere. It is an established coastal community with its own identity, relationships, environment and way of life. A new residential subdivision cannot simply recreate what makes Amberley Beach the community it is.

We are **not opposed to responsible planning for coastal risk**. We are opposed to this Plan Change proceeding in a manner that, in our view, moves ahead of the agreed trigger-based process and effectively progresses proactive relocation before the circumstances identified in the CAP have occurred.

We respectfully ask that Plan Change 7 be declined, or at minimum paused until:

- the Coastal Adaptation Plan has been formally reviewed;
- Council clearly identifies what agreed trigger or other provision of the CAP justifies progressing proactive relocation at this time;
- the community has been properly consulted about this significant change in direction; and
- the relationship between Plan Change 7, the land-banking proposal and the agreed trigger-based CAP process has been clearly explained.

We supported the CAP based on the understanding that it provided a **measured, adaptive and trigger-based pathway for the future**.

We believe that process should be honoured.

Our home is not simply an asset. Amberley Beach is our home, our community and the place we chose to invest in. We believe decisions of this magnitude should not be made for our community without meaningful community involvement and without first following the process that was agreed.

Individual Submission – Sean Doak

Proposed Plan Change 7 – Rosewood Terrace

I oppose Proposed Plan Change 7 and the proposed rezoning of the Rosewood property.

I am making this submission as an individual member of the Amberley Beach community.

I understand Council has to consider the potential effects of coastal hazards. However, I am concerned that PC7 is based on an assumption that proactive relocation is the appropriate solution, when I do not believe that has been established.

I do not believe we should accept that Amberley Beach must eventually be relocated simply because relocation has been identified as one possible pathway in the Coastal Adaptation Plan.

The CAP does not establish that relocation is inevitable

The CAP considered a number of possible responses to coastal hazards, including ongoing bund maintenance, changes to the bund, hard protection, inundation protection and proactive relocation.

The Section 32 Report confirms that these options can be combined and are not mutually exclusive.

That makes me question why Council is now treating Rosewood rezoning as the necessary next step.

The CAP was intended to provide a framework for responding to changing circumstances. It established triggers so that major decisions could be made when the evidence indicated that they were required.

I have not seen sufficient evidence in the PC7 material demonstrating that those triggers have been reached to justify progressing to permanent residential zoning.

The current evidence needs to be tested

The Section 32 Report relies heavily on the CAP and the technical information behind it.

Some of that information is now several years old.

There has also been significant work undertaken on the existing bund since the CAP was prepared.

Before Council makes a decision that could permanently change 34 hectares of rural land, I believe it should establish what the current evidence actually shows.

That includes:

- the current condition of the bund;
- current erosion and inundation information;
- the effect of recent renourishment;
- the expected future maintenance requirements;
- the current status of the CAP triggers; and
- whether the projections used in the CAP remain appropriate.

I do not think it is reasonable to make a permanent planning decision based primarily on historic projections without first checking whether those projections remain valid.

I do not accept that relocation should be the default response

I am particularly concerned that the language surrounding PC7 increasingly presents relocation as the solution to the hazards at Amberley Beach.

The Section 32 Report describes the purpose of PC7 as allowing the proactive relocation of the Amberley Beach settlement.

That appears to go further than simply preparing an option.

In my view, there is a significant difference between **having a contingency option available** and **planning for the relocation of an existing community as though that outcome has already been determined**.

I do not believe the Council has demonstrated that the latter is justified.

The financial case is not certain

The proposed Rosewood development is also significantly larger than the number of existing Amberley Beach properties.

The Section 32 Report indicates that between 213 and 238 lots may be required and that approximately 120 market lots would help reduce the likelihood of a community subsidy.

That is a significant development being justified partly on the basis of funding a future relocation.

However, the financial outcome depends on assumptions about development costs, market values, demand and timing.

I am not satisfied that the financial risks have been adequately addressed.

If the development does not produce the anticipated return, I want to know exactly who carries that risk.

The loss of rural land also matters

The Rosewood site contains highly productive land.

The Section 32 Report acknowledges the importance of protecting highly productive land for primary production.

I question whether permanently rezoning this land can be justified when the need for the proposed development remains uncertain.

The fact that additional residential lots are needed to make the relocation model work should not, by itself, justify converting productive rural land into a large residential development.

Council should not allow the purchase of Rosewood to dictate the outcome

Council has already purchased the property.

I do not believe that purchase should predetermine what happens to the land.

If the current evidence does not justify residential zoning, then Council should be prepared to reconsider the proposal rather than proceed simply because the property has already been purchased.

My request

I ask Council to **decline Proposed Plan Change 7**.

At a minimum, I believe Council should stop and independently reassess:

- the CAP and its underlying technical evidence;
- the current status of its triggers;
- the current condition and future performance of the bund;
- the climate and hazard modelling;
- the financial assumptions behind Rosewood; and
- all available alternatives to a large-scale residential rezoning.

I do not support making Amberley Beach relocation the assumed end point of the Council's planning process.

The future of Amberley Beach should be determined by evidence and properly tested options, not by a decision that relocation is inevitable and therefore requires Rosewood to be rezoned.

I therefore ask that **PC7 be declined**.

I wish to be heard in support of my submission.

Individual Submission – Adele Brown

Proposed Plan Change 7 – Rosewood Terrace

I oppose Proposed Plan Change 7 and the proposed rezoning of the Rosewood land.

I am making this submission as an individual member of the Amberley Beach community. I have concerns about the basis for the proposed rezoning and, in particular, the assumption that proactive relocation of Amberley Beach is an appropriate outcome to be progressing at this time.

I accept that coastal hazards need to be taken seriously. However, I do not accept that the existence of coastal hazards automatically means that Amberley Beach should ultimately be relocated, or that Council should therefore rezone approximately 34 hectares of rural land now.

The CAP was intended to be adaptive

The Amberley Beach Coastal Adaptation Plan (CAP) identified a number of possible responses to coastal hazards. These included continued bund management, relocation of the bund, hard protection, an inundation bund and proactive relocation.

The Section 32 Report acknowledges that these options are **not mutually exclusive**.

This is important because I do not believe the CAP established that proactive relocation was the inevitable or preferred outcome. It provided a framework for considering different options as circumstances and information changed.

The CAP also established specific triggers to help determine when a change in approach should occur.

I am therefore concerned that Council is now progressing a permanent residential zoning for Rosewood without clearly demonstrating that the CAP triggers have been reached or that the evidence requires the community to move towards relocation.

I question the need to make this decision now

The existing Amberley Beach bund has provided protection to the community for many years and has recently undergone significant renourishment.

The Section 32 Report continues to rely on projections contained within the CAP regarding the future performance and effectiveness of the bund.

I believe these assumptions should be independently reassessed before they are used to justify a permanent change to the District Plan.

In particular, Council should provide current information about:

- the condition and performance of the bund;
- current erosion rates;
- the expected life of the bund following renourishment;
- future maintenance requirements and costs; and
- the current status of the CAP triggers.

Until that information is available, I do not believe there is sufficient evidence to justify proceeding with PC7.

The science and modelling should be reviewed

The technical work underpinning the CAP is now several years old.

For a decision that could permanently change the future of Amberley Beach and remove a large area of productive rural land from its current use, I believe Council should ensure that the scientific information remains current.

This should include an independent review of the hazard modelling, climate assumptions and projections used to support the CAP and PC7.

The purpose of an adaptive plan is surely to allow new information to influence future decisions. It should not become a fixed justification for a decision that was not originally intended to be made until the evidence warranted it.

I am concerned about the financial justification

The proposed development could provide up to approximately 230 residential lots, while the Section 32 Report identifies 109 Amberley Beach properties as potentially requiring relocation. The additional development is intended to help fund the proposal.

Council's own assessment acknowledges uncertainty around the timing and financial outcome and states that allowing 120 market lots would help ensure that, **in most outcomes**, the community would not have to subsidise the relocation.

I do not consider "in most outcomes" to be sufficient certainty to justify such a significant rezoning.

There remains a financial risk associated with development costs, infrastructure costs, property values, market demand and the timing of any development.

I am not comfortable with the possibility that ratepayers could ultimately carry costs associated with a development that has been justified on the basis that it will be financially neutral.

Loss of productive land

I am also concerned about the permanent loss of highly productive rural land.

The Section 32 Report acknowledges that the land is subject to the National Policy Statement for Highly Productive Land and that the purpose of that policy is to protect highly productive land for land-based primary production.

The Council's justification for using this land is closely connected to the proposed relocation model and the need for sufficient development to make that model financially viable.

I do not believe that is sufficient justification when the necessity and timing of the relocation itself remain uncertain.

Rosewood should not determine the future of Amberley Beach

Council has purchased the Rosewood land and is now seeking to rezone it.

I am concerned that this has created a situation where the existence of the land is beginning to drive the decision rather than the evidence.

The fact that Council owns a property does not, in my view, mean that it should be rezoned or developed.

The question should be whether residential zoning is justified **on the evidence available today**.

I do not believe that has been demonstrated.

My position

I ask Council to **decline PC7**.

I do not believe Council should proceed with a permanent residential zoning based on an assumption that Amberley Beach will ultimately be relocated.

If Council believes the CAP remains the appropriate framework, then I believe it should first:

- establish and publish the current status of the CAP triggers;
- independently review the hazard and climate information;
- reassess the condition and future performance of the bund;
- reassess the costs and benefits of the different adaptation pathways;
- independently test the financial assumptions behind Rosewood; and
- properly reconsider whether rezoning this land is necessary at all.

I support sensible monitoring and preparation for the future, but I do **not** support prematurely committing the community to relocation or creating a new residential

settlement on productive rural land before the evidence demonstrates that this is necessary.

The fact that relocation is one option identified in the CAP does not mean it should become the predetermined outcome.

For these reasons, I ask that **Proposed Plan Change 7 be declined**.

I wish to be heard in support of my 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 August 2026**

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

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

Plan Change 7 – Rosewood Terrace

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

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

1. Submitter details:

Name/s: (Full name) Groundswell NZ	
Contact person: Jamie McFadden	Designation: Environment spokesperson
Address for service: 24 Mina Road, RD2, Cheviot 7382	
Email address: hurunuinatives@xtra.co.nz	Telephone: 0273218747

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 all provisions that:

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

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

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

We oppose Plan Change 7 in its entirety.

The reasons for our opposition is set out below.

1. Highly Productive Land – Loss of Rural Capability

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

Key concerns:

- **Permanent loss of highly productive land:** Once rezoned and subdivided, this land cannot be returned to rural production.
- **Contradiction with national direction:** Government guidance has recently emphasised that **extreme climate scenarios should not be used to justify rezoning highly productive land**, and councils must rely on robust evidence and independent scrutiny.

- **No demonstrated necessity:** The plan change is framed as "proactive relocation," yet the Council acknowledges uncertainty about future hazard timelines. The proposal is therefore premature and not justified by immediate need.

2. Reverse Sensitivity Effects on Existing Rural Landowners

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

Specific risks:

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

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

3. Inadequate Evidence for Climate-Driven Relocation

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

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

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

4. Conflicts with District Plan Objectives and Rural Zoning Purpose

The Hurunui District Plan seeks to:

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

PC7 contradicts these objectives by:

- Creating a large, standalone residential enclave in a rural setting
- Introducing urban density incompatible with surrounding land uses

- Requiring new rules, exemptions, and special provisions (e.g., removal of staging limits, new yard rules, non-complying triggers) to force residential development into an area not suited for it

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

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

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

6. Relocation verses new urban development.

Plan Change 7 is framed as relocation but given the strong opposition from the Amberley Beach community, it is likely that few of these residents would ultimately reside at Rosewood. Even if a reasonable number of Amberley Beach residents relocated to Rosewood Terrace, the majority of residents would not be from Amberley Beach. Aspirations to keep the integrity of the Amberley Beach community housed in one area of new development is fanciful.

For all intents and purposes Rosewood Terrace is a new residential area arbitrarily plonked in the middle of highly productive rural land. It would make far more sense to add to the existing urban footprint area of Amberley or create opportunities to cater for Amberley Beach residents in new subdivisions. And utilising existing infrastructure, rather than having to start from new and avoiding all the detrimental impacts of urban settlement being established in a rural setting. This is of course, assuming the climate change modelling justifying relocation is accurate.

5. I seek the following decision from the Council:

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

We request that the Hearings Panel:

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

Plan Change 7 is not justified, not aligned with the District Plan, and not supported by robust evidence. It would permanently remove highly productive rural land, create significant reverse-sensitivity issues for neighbouring landowners, and introduce urban development into an area not suited for it.

For these reasons, we strongly oppose PC7 and request that it be declined.

6. Hearing:

I wish to be heard in support of my submission: YES [Y] NO [ ]

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

RECEIVED
03 JUL 2026
BY:

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:**

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)

Ann REBECCA MALTHUS

Contact person:	Designation: **Property Owner, Amberley Beach**
Address for service: **11 Holton Road, Amberley Beach**	
Email address: **bexm08@gmail.com**	Telephone: **022 315 0794**

2. For the purposes of section 308B of the Resource Management Act
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: **NO so NOT RELEVANT** (a) Adversely affects the environment; NO b) Does not relate to trade competition or the effects of trade competition. NO

I am not a trade competitor YES
3. The specific provisions of the proposal that my submission relates to:
My submission relates to: The whole of the proposed Plan Change 7, specifically... - The rezoning of the identified land - The Outline Development Zone and Outline Development Plan - The stated purpose regarding relocation of the Amberley Beach community/individuals and provisions, policies, rules, explanatory material and implementation framework associated with the plan - The layout of the plan as shown in the Development Outline - The practical implementation of any relocation of Amberley Beach residents including any provisions, policies or implementation mechanisms that affect timing, process, triggers as outlined in the document 'Amberley Beach: Proposal for Managed Retreat and Land Banking (March 2023) - That Amberley Beach residents needs and wishes regarding allocation of properties to retain a sense of community are reflected in Council decisions in follow-up planning
4. My submission is in SUPPORT

I support Plan Change 7 – Rosewood Terrace, subject to the amendments and clarifications requested below...

I believe the proposal is a positive and necessary planning response to long-term risks facing the Amberley Beach settlement i.e. coastal erosion, inundation, fluvial and pluvial flooding, and rising ground water. It is definitely appropriate for the Council to plan to support one of its communities facing the risk of natural hazard event(s) that could negatively affect the Amberley Beach area being suitable for residential use

The chosen location is in a nearby area giving similar access to our current environment plus it allows for relocation of the Amberley Beach community in a manner that is cost neutral to other residents in the district.

However,

My support is conditional on further clarification containing specific, detailed information as to when's, how's, why's of the relocation framework as perceived by both the Council. These include:

- The Outline Development Plan ensures an area above the hillside overlooking Hursley Terrace is designated reserve land to ensure all residents have access to the full length of the reserve

- The options available regarding purchase of properties enable all residents to take advantage of the opportunity should they wish to do so.

- Assurance from the Council ensuring individual resident choice for the timing of any relocation is confirmed in writing.

- Statements regarding how identified triggers will be responded to by the Council, (and any expectations then likely to be put on residents are established) are clear and objective and the March 2023 document (regarding managed retreat/relocation) is updated accordingly.

- The allocation of the properties at Rosewood will be done in a fair and equitable manner. The selection of properties to be allocated to interested Amberley Beach residents and those to be sold commercially, reflect the community nature of the current Amberley Beach residential area and the fact that the Plan was initiated for the future/benefit of Amberley Beach residents.

- Details surrounding purchase (all costs involved) and development of the property (any caveats and covenants) need to be clearly identified and recorded

-

My reasons are

1.Being proactive is preferable to being reactive, hence my support for this concept.

2. Current confusion is high within the Amberley Beach community regarding the Plan and how it will be enacted. Clear communication is needed going forward.

3. Specifics regarding choice, timing, triggers and the plan for allocation of properties need to be identified for individuals to make decisions regarding their involvement in plans for relocation (which I repeat is the underlying reason for Plan Change 7).

Should these clarifications be met appropriately, following an open and constructive process of discussion and consultation with the Amberley Beach residents, and outcomes publicly shared with all interested parties, I would continue to support Plan Change 7.

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

I seek the following decision for the Hurunui Council –

The Hurunui Council takes the steps required to have the relevant part of 185 Ashworth Road, Amberley rezoned to be a Residential 1 Zone.

AND

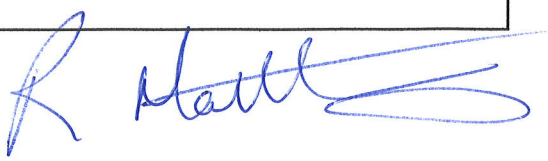
If the rezoning is approved ...

The Council will maintain regular communication and negotiation with the Amberley Beach Residents Association to finalise details regarding potential relocation of Amberley Beach residents (as outlined in the previous section) in a manner agreeable to both parties and that these details are recorded and shared publicly to enable residents to be knowledgeable of all pieces of key information in order for them to have the confidence to decide on their involvement in any future relocation.

6. Hearing:

I wish to be heard in support of my submission: NO, except if ... *see below*

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



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):

o it is frivolous or vexatious:

o it discloses no reasonable or relevant case:

o it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:

o it contains offensive language:

o it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

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HURUNUI DISTRICT COUNCIL

FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

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

To: Hurunui District Council	**Date:24/07/26**

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)

Christopher john herbert

Contact person:	Designation:

Address for service:

224 reeces rd rd3 amberley

Email address:chrisjherbert@xtra.co.nz	Telephone:021677222

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 rsely affects the environment; and

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

[X] I am not a trade competitor

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

I oppose all provisions that:

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

4. My submission is in [ ] support [x] opposition (tick applicable)

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

I/we oppose Plan Change 7 in its entirety.

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

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

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

2. Reverse Sensitivity Effects on Existing Rural Landowners
Rezoning rural land to residential introduces new residents who may be unfamiliar with rural activities, creating **reverse sensitivity** pressures on established farming operations.
Specific risks:

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

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

3. Inadequate Evidence for Climate-Driven Relocation
The plan change is justified primarily based on coastal hazard risk at Amberley Beach. However:

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

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

4. Conflicts with District Plan Objectives and Rural Zoning Purpose
The Hurunui District Plan seeks to:

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

PC7 contradicts these objectives by:

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

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

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

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

5. I seek the following decision from the Council:

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

I request that the Hearings Panel:

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

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

6. Hearing:

I wish to be heard in support of my submission: YES [ ] NO [x]

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

Notes:

- The closing date for serving submissions on the consent authority is the 20th working day after the date on which notification is given **(5pm Friday 7 August 2026)**.
- If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
- Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
    - it is frivolous or vexatious:
    - it discloses no reasonable or relevant case:
    - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
    - it contains offensive language:
    - it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Privacy information:

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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 proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To:	Hurunui District Council
Submission on:	Plan Change 7: Rosewood Terrace
Name of Submitter:	Fire and Emergency New Zealand

This is a submission on behalf of Fire and Emergency New Zealand (**Fire and Emergency**) on Plan Change 7 (**PC7**) to the Hurunui District Plan (**the Proposal**).

Fire and Emergency could not gain an advantage in trade competition through this submission.

Fire and Emergency is **neutral** on the Proposal, subject to the relief sought in this submission.

The specific parts of the Proposal that Fire and Emergency's submission relates to are:

- Emergency vehicle access; and
- Any consequential amendments required to give effect to the relief sought.

Fire and Emergency's submission is:

In achieving the sustainable management of natural and physical resources under the Resource Management Act 1991 (**RMA**), decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment.

The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of the Hurunui District Plan (**HDP**) to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements.

In order to achieve its principal objective of reducing the incidence of unwanted fire and the associated risk to life and property, protecting and preserving life, and preventing damage to property, land and the environment, Fire and Emergency requires adequate access for new developments and subdivisions to ensure that it can respond effectively in an emergency.

Adequate access to both the source of a fire and firefighting water supplies is essential to support operational firefighting requirements.

The supporting assessments for PC7 indicate that emergency vehicle access can be achieved within the proposed development. Internal road will be required to be designed and constructed in accordance with the HDP and the Hurunui District Council Development Engineering Standards, and the proposed road widths are considered sufficient for Fire and Emergency operational requirements. Future access within the development area is therefore generally considered to be adequate from a Fire and Emergency perspective.

Beca

PC7 proposes that access to the development be provided from both Ashworths Road and Hursley Terrace Road. From a Fire and Emergency perspective, the provision of two access points would improve network resilience and help maintain emergency access should one route become unavailable due to an incident, maintenance activity, natural hazard, or staged development of the neighbourhood. However, while the Outline Development Plan (**ODP**) identifies two access points, the proposed provisions appear to require subdivision to be in general accordance with the ODP rather than expressly requiring both access points to be constructed. On the information reviewed, there does not appear to be an explicit rule or standard requiring both accesses to be delivered. As a result, there is currently limited certainty that both access points shown on the ODP will be constructed, which may reduce the resilience benefits associated with having multiple points of access for emergency response.

Fire and Emergency therefore seek amendments to PC7 to expressly require the formation and construction of both access connections shown on the Outline Development Plan.

Fire and Emergency seek the following decision from the local authority:

- Amend PC7 to expressly require the formation and construction of both access connections shown on the Outline Development Plan, being the connections to Ashworths Road and Hursley Terrace Road, either through the Rosewood Terrace Management Area provisions, subdivision provisions, or another appropriate planning mechanism; and
- Make any other consequential amendments necessary to give effect to the relief sought.

Fire and Emergency wishes to be heard in support of its submission.

If others make a similar submission, Fire and Emergency will consider presenting a joint case with them at a hearing.



Millie Kennedy

Signature of person authorised to sign on behalf of
Fire and Emergency

Date:	07/08/2026
Electronic address for service of person making submission:	millie.kennedy@beca.com
Telephone:	+6433672497
Postal address:	Beca Limited ANZ Centre Level 2, 267 High Street Christchurch 8011
Contact person:	Millie Kennedy

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: Friday 7th August 2026**

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

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

Plan Change 7 – Rosewood Terrace

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

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

1. Submitter details:

Name/s: (Full name) **Anthony Charles Trewinnard (Tony)**

Contact person:	Designation:

Address for service:

16 Teviotview Place, Amberley 7410

tony@blueskies.co.nz

Email address:	Telephone: **021 2247767**

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 Plan Change 7 in its entirety and seek that it be declined. I make this submission as a resident of the Hurunui District with a longstanding interest in the district's planning and adaptation processes, including the Amberley Beach coastal conversations.

My opposition should not be misread as opposition to coastal adaptation at Amberley Beach. I support the Amberley Beach Coastal Adaptation Plan (CAP) and the dynamic adaptive pathways approach it embodies. I support land banking in principle as a prudent, low-regrets measure, and I accept that the Council's purchase of Rosewood Farm in May 2025 secured an option that may not have been available later; land, once sold, cannot easily be reacquired. My opposition is directed at what PC7 actually enables. It does not hold land in readiness for a trigger-based relocation. It enables the immediate commercial development of highly productive rural land — groundworks from 2027, and 115 to 150 market lots sold between 2028 and 2032 on the Economic Impact Assessment's staged scenario — commencing years before any adaptation trigger has been met, and out of sequence with the implementation pathway the community agreed in the CAP and the Managed Retreat and Land Banking Proposal (MR&LB Proposal).

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

1. PC7 departs from the sequence the community agreed

1.1 The agreed sequence

The CAP is expressly trigger-based, not time-based. It explains that this approach means acting only when needed while remaining well prepared to act (CAP s1.3), and it establishes seven triggers designed to provide a ten-year lead time for implementing the next action (CAP s5.1). Section 5 then sets out the agreed decision architecture: when the first trigger is reached, the Council initiates a conversation about next steps; when two triggers are reached, a formal decision on next steps is made; and only if managed retreat is then the chosen pathway does work on the subdivision begin, 'including preparing the Plan Change to rezone the land', the subdivision consent, and construction of infrastructure.

The MR&LB Proposal — the document from which the land swap mechanism derives — is to the same effect. Its Timing section (s4) states that once the trigger point is reached and a decision made, work towards the new subdivision can commence, and lists the plan change, subdivision consent, physical construction works and construction of dwellings as the actions required 'in the ten year period between the trigger being reached and the adaptation threshold being reached'. Its s2.5 states that a subdivision consent will be applied for 'once the trigger point is reached and a decision has been made to retreat'. Its s2.1 states that the land 'will be land banked and maintained by Council until it is required', with the date it is required 'determined by the trigger points set out in the Coastal Adaptation Plan'. No trigger has been met. The community endorsed a framework in which land banking secures the option, and development follows the trigger; PC7 delivers development first and holds only the relocation lots back.

1.2 The section 32 report mischaracterises that sequence

The section 32 report presents advance rezoning as a necessary and anticipated step in implementing the MR&LB Proposal. The foundation documents do not support that presentation. The only

contemplation of an earlier plan change appears in s2.4 of the MR&LB Proposal, which states there is 'no rush to complete the Plan Change' and notes it could occur earlier if included as part of a wider planning process to reduce cost. That is permissive cost-saving language, conditional on bundling that has not occurred: PC7 is a standalone plan change, prepared and consented at a cost the Economic Impact Assessment estimates at $250,000. More fundamentally, PC7 goes far beyond completing a plan change early. The development programme it enables proceeds immediately to groundworks and market lot sales, regardless of triggers — activity that both foundation documents place after a trigger and a formal community decision. In substance, the majority of what PC7 enables in its first decade is an ordinary residential subdivision of approximately 150 sections on land classified LUC 2 and 3, while the relocation function that is its stated purpose remains contingent and deferred. The consumption of highly productive land is immediate and certain; the adaptation benefit is neither.

1.3 Premature development forecloses the community's decision

The CAP warns specifically that care needs to be taken when implementing options now that might prevent an alternative option being adopted in future (s1.3), and records that land banking 'does not lock in retreat as the future option' — it secures land should retreat be required, while leaving the formal choice between managed retreat and hard protection to the trigger-based decision point (s4.1, s4.2). The pathways map in the CAP preserves hard protection, an inundation bund and pump station, and combinations of these as live options alongside managed retreat. A substantially completed and sold subdivision does precisely what the CAP cautions against: it entrenches one pathway, financially and psychologically, before the community's decision between pathways has been made. Once $12.5 million of groundworks are in and 150 market lots sold, the practical pressure at any future decision point will be to validate the investment already made. That inverts the dynamic adaptive pathways logic on which the community's trust in the CAP rests, and it risks damaging confidence in trigger-based adaptation planning more generally — a matter of some consequence given the s32 report's observation that PC7 may serve as a prototype for managing natural hazard risk in other locations. If the prototype teaches that triggers govern residents' obligations but not the Council's development activity, it is a poor precedent.

I understand that opposition to PC7 on these prematurity grounds is shared widely among Amberley Beach residents themselves, and I anticipate the Commissioner will see this reflected in the submissions received. That opposition is itself evidence of what the community understood it was agreeing to: a trigger-based sequence in which development follows a formal decision, as recorded in CAP section 5. It cannot be reconciled with the section 32 report's presentation of advance development as a step the community anticipated and endorsed. Where the Council's case for consuming highly productive land rests on community endorsement, and the community whose endorsement is invoked opposes the proposal, the foundation of that case has fallen away.

2. There is no urgency in the Council's own evidence

Nothing in the Council's material identifies a present need to develop. The Economic Impact Assessment's analysis of the measurable triggers suggests the bund renourishment cost trigger may not be reached until around 2043 on current cost trends, and considers the significant capital works trigger unlikely to occur until after 2035. The CAP itself anticipates no significant capital works within the next 30 years (s5.1) and commits to maintaining existing levels of service until a trigger is reached (s6.1). The MR&LB Proposal acknowledges that if change happens slower than expected the bund may still be effective in 30 years or longer (s4). The farm meanwhile remains leased and in productive use, generating rent to the Council — a working demonstration that the current Rural zoning is fully compatible with the land-banking function.

The cost of deferral is modest and acknowledged: some inflation in future development costs, tested in the Economic Impact Assessment's sensitivity analysis, against which must be set the investment return on funds not yet borrowed and spent. The benefit of deferral is substantial: both adaptation pathways remain genuinely open; the land remains in production; and if the best-case scenario contemplated in

the MR&LB Proposal eventuates and relocation is never needed, the Council holds an intact productive farm rather than a partially developed subdivision. The CAP's ten-year lead time exists precisely so that the plan change, consenting and construction can follow a trigger with adequate time; a rezoning advanced at that point would carry the mandate and urgency a triggered relocation provides.

Trigger timeframes may also prove longer than the planning assumptions suggest. The CAP's hazard assessments were undertaken under the RCP 8.5 and RCP 8.5+ scenarios only (CAP s2.1) — the highest emissions pathways in the Ministry for the Environment guidance then in force. The peer-reviewed literature increasingly regards RCP 8.5 as an implausible representation of a business-as-usual future (for example, Hausfather and Peters, Nature, 2020), and the IPCC's Sixth Assessment Report characterises very high emissions pathways as of low likelihood under current policy settings. I do not suggest the coastal hazard at Amberley Beach is not real; it plainly is, and the erosion record is empirical. But the inundation and groundwater projections that inform the risk trajectory, and hence the likely timing of triggers, are scenario-dependent, and the CAP itself commits to periodic review against updated sea level rise predictions (s6.2). If the high-end scenarios overstate the trajectory, trigger horizons already estimated in the 2040s sit further out still. That is not an argument against preparedness; it is an argument for holding the land in its current zoning until the CAP's own review and trigger machinery — not a development cashflow model — determines that action is required.

3. NPS-HPL: the clause 3.6(4) and 3.6(5) tests are not met

The Plan Change Site is predominantly LUC 2 land with a small portion of LUC 3, and is therefore highly productive land under the National Policy Statement for Highly Productive Land 2022. Clause 3.6(4) permits urban rezoning by a non-tier 1 or 2 authority only where the capacity is required to meet expected demand for housing (a), there are no other reasonably practicable and feasible options (b), and the benefits of rezoning outweigh the costs of losing the land for primary production (c); clause 3.6(5) separately requires the spatial extent to be the minimum necessary.

On clause 3.6(4)(a): of the roughly 260 lots the rezoning would enable, only 109 are relocation lots. The remaining 150 or so market and affordable lots are not required to house the relocating community; they are a funding mechanism. The demand case for them rests substantially on ordinary South Ward growth, yet the Economic Impact Assessment records existing zoned capacity for approximately 790 additional dwellings in the South Ward — roughly nine years of supply even at the higher observed consenting rates. Capacity created to fund a contingency whose trigger conditions are unmet, in an area with that level of existing zoned capacity, is a strained fit with 'required to provide sufficient development capacity to meet expected demand'.

On clause 3.6(4)(b): the alternatives assessment in the Economic Impact Assessment, adopted by the s32 report, considers only alternative locations. It never evaluates the alternative that the CAP itself prescribes — retaining the Rural zoning until a trigger is met, then rezoning within the ten-year lead time. Section 32(1)(b) of the RMA requires reasonably practicable options to be identified and assessed; the s32 report's options assessment includes a 'status quo' option but evaluates it as permanent inaction that 'does not provide an option for the proactive relocation', rather than as trigger-aligned deferral that provides exactly that option on the community's agreed timetable. The most obvious and least damaging alternative has therefore not been genuinely assessed.

On clause 3.6(4)(c): the claimed benefits — avoided hazard protection costs, avoided damage, avoided buyout — are benefits of relocation, and accrue only if and when relocation occurs. The costs — the permanent loss of 22 to 27 hectares of LUC 2 land from production, assessed by the Council's own evidence at $91,000 to $114,000 per annum of farming production — begin in 2027 and are incurred whether or not relocation ever happens. A cost-benefit balance that weighs certain, immediate costs against contingent, deferred benefits should at minimum be discounted for that contingency; the assessment does not do so. Deferring the rezoning until a trigger converts the contingent benefits into near-certain ones and aligns costs with benefits in time, which is a materially better balance under (c).

On clause 3.6(5): the Economic Impact Assessment concludes that 22 hectares is the minimum required for financial neutrality, with 24 to 27 hectares providing a comfortable risk margin — yet PC7 rezones approximately 34 hectares. The s32 report explains the additional extent as open space and non-developable gully land, but clause 3.6(5) directs the minimum necessary urban zone over highly productive land; open space serving the development can adjoin a residential zone without itself being rezoned Residential 1. An extent one-quarter to one-half larger than the Council's own assessed comfortable range is not the minimum necessary.

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

I seek that Plan Change 7 be declined, and that the land be retained in its current Rural zoning until a trigger under the Amberley Beach Coastal Adaptation Plan is met and the community's formal decision between adaptation pathways has been made, at which point a rezoning can be advanced within the CAP's ten-year implementation lead time, consistent with CAP section 5 and the Timing section of the MR&LB Proposal. Declining PC7 forecloses nothing: the land remains in Council ownership, in production, and available; the relocation pathway remains fully open on the community's agreed terms.

In the alternative, if the Commissioner is minded to approve a rezoning in some form, I seek the following modifications: (a) that live development capacity be deferred, through a rule framework under which any subdivision within the Plan Change Site is a prohibited or non-complying activity until a CAP trigger is formally confirmed by Council resolution as having been met, so that the zoning serves the agreed relocation pathway rather than enabling an immediate market subdivision; and (b) that the spatial extent of any Residential 1 zoning be reduced to the 22 to 27 hectare range identified in the Council's own Economic Impact Assessment as sufficient for a financially neutral outcome, with the balance of the site retained in Rural zoning or zoned for open space, consistent with clause 3.6(5) of the NPS-HPL.

I ask that the Commissioner also note that this submission supports the Coastal Adaptation Plan and the relocation option itself; the relief sought is directed solely at aligning the District Plan with the sequence and safeguards that the Amberley Beach community agreed.

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.

signed



Anthony Charles Trewinnard 7 August 2026

HURUNUI DISTRICT COUNCIL

FORM 5

Submission on notified plan change to the Hurunui District Plan

Clause 6 of Schedule 1, Resource Management Act 1991

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

To: Hurunui District Council	**Date: 19/8/2026**

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)

Nicola Reed

Contact person: Nicola	Designation: Mrs

Address for service: 60 Grierson Avenue , Amberley Beach

Email address: amberleyreelfnc@outlook.com	Telephone: 02904302359

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:

Proposed Plan Change 7 to rezone 185 Ashworths road to Residential 1 with outlined Development zone

Enable new residental settlement for the potential Proactive relocation of amberley beach community

Provide enough addition sections to make the development financially neutral to the wider community.

Relationship with costal adaptation plan

Why council say this plan change is needed

Managed retreat proposal

Councils Position and Justification and any consultation undertaking

Highly productive land

Main planning rule changes

Consultation Undertaking

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 Oppose to the Plan change 7

Amberley Beach residents were given information about the CAP b few years ago, This was not agreed upon by a majority – Most of us disagreed at the beginning.

The Cap was put in place as a protection method for when Hazards occurred – There has been NO hazards of Date. The CAP also hasn't been independently reviewed therefor is it actually appropriate and the facts given actually accurate?

The Bund provides protection for the beach residence which gets paid for by the residents. We have only used 1 method for the bund where there are lots of other alternatives as seen around the country ie Hard protection, Bund and a Pumping system.

Managed Retreat was the very very last option – Definitely not the FIRST option.

This has caused a lot of stress and worry causing extreme anxiety and stress disorders, as we have a property worth a lot of money and the property value is decreasing with all this talk and focus onto the area.

The Managed Retreat process has not been agreed upon with the Amberley beach residents – we never said we wanted to move up a hill – this does not keep the community connected as they will be ballot out and they have not explained how this is going to look

This will cause extreme financial pressure we loose all equity in our current property will cost 1million plus to rebuild what we have and pay for demolishing – we have no way to pay for this.

Technical reporting's I feel haven't been disclosed at true findings given all the facts, some reports the issuers gave no formal support to the proposal where others required further provisions.

Councils justifications are not what the actual residence are asking for they never asked us where we would like to go if something happened or how we would like this to work going forward.

The Rosewood site is Highly productive land – land use capability (LUC) class 2 and class 3 in some areas . Council rezoning is being justified because – no other sites exists – I don't believe this is the case it was bought very fast without the residence or rate payers consents.

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

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

I feel this process being so heavily reliant on the CAP I feel this needs to be independently reviewed before they are used to justify permanent rezoning of productive rural land.

The Cost Neutral position the council talks about what are the actual contingency plans here. It is not cost neutral to the residence at Amberley beach what support is offered to them since its apparently for them?

The council states No practical alternative – the reportings don't present a comparative assessment of other sites within the section 32 report itself. The reasoning the council states says its about the residence but the residence were not given any options or say in anything.

The report acknowledges the CAP identified several options ie Bund relocation hard protection inundation bund and lastly proactive relocation However the report is focused entirely on the proactive relocation rather than looking into other ways to actually keeping the community together where they are all happy.

The trigger based planning – No triggers have happened the CAP has not been reassessed or looked at since the time it was written is it still even valid?? A minority voted for it majority did not.

The final cost to move how can people in the community afford to abandon their houses and move there is no financial support offered, Most houses can not be relocated to the land.

There needs to be more information regarding the financial assistance available for relocation we were told at the start it could be a insurance payout if event happened but this is the unlikely occurrence how can a council put people in such a bad financial position.

The Bund provides protection for the beach residence which gets paid for by the residents. We have only used 1 method for the bund where there are lots of other alternatives as seen around the country ie Hard protection, Bund and a Pumping system.

Managed Retreat was the very very last option – Definitely not the FIRST option.

This has caused a lot of stress and worry causing extreme anxiety and stress disorders, as we have a property worth a lot of money and the property value is decreasing with all this talk and focus onto the area.

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

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

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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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:**

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

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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)	
Jicinta maire McBain	
Contact person:	**Designation:**
Address for service: 491 Christys Road RD 7 Ashburton 7777	
Email address: jicintamcbain@hotmail.com	**Telephone:** (021) 345090

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 relocation of the Amberley Beach Residents from the Beach to the proposed 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.

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

I have a house there that I had built 19 years ago that I'm now being told I have to give up and move away from the beach up to the Terrace and offer a section for $13,000. Finacilly I will be out of pocket by loosing an income & still having to turn around & build a house at my expense.

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

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

~~Pg. three.~~

Before there is a decision made. there needs to be more discussion around

* Is the move volinteering. or you have to move.
* It needs to be more financil viable.
* Is there an option of doing more. protection. work. around Ambety Beach.

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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Dianne Le Compte 027 321 9202
5 Turnball Lane
Auckerley Country Estate
dianne.lecompte@yahoo.co.nz.

RECEIVED
21 AUG 2020
BY:

My SUBMISSION IS IN OPPOSITION TO PROPOSED PC7
I fully oppose this PC7 proposal for the following reasons.

My husband & I have been owners of a property at 33 Chamberlain Avenue Auckerley Beach since 1968 when the land was leased from the Marine Department. At that time water was pumped from underground by hand pump into our own storage tank. There was a weekly collection of the toilet sewage can. A later supply of water & sewage collection made life a lot easier.

Our family of four - daughter aged 5½ years & son of 9 mths - stayed at this beach every school holidays & long weekend breaks. They grew up loving their beach holidays. These 2 children still use the beach, along with their children (our grandchildren) & we are sure our first great grandson will do the same. Many friends also joined our various family generations for many holidays.

Over time the land was purchased as freehold, the old beach dispersed of, a 3 bedroom consented building established & an airing, lean-to garage demolished to be replaced by a new garage. Boundary fences, some gardens are also in place.

Note that we have enjoyed upgrading + improving our back right on the seas shore.

Initially most baches were only used for holidays & long weekends but over the years the number of permanent residents has increased to a sizeable village of permanent residents. Over this time these people have become a close-knit community. Most people live there because of the sea + affordability.

Our family were involved in evolving the CAP - Coastal Adaptation Plan, which was also adopted by the Hurunui District Council (HDC) This is a seven (7) point plan + we all understood that nothing would happen until one (1) of these triggers chosen would happen.

The first line of defence for beach residents is the bund which has recently been rebuilt. Beach residents have paid an extra rates levy to help fund building + maintaining bunds for many years + are still required to pay back the recent loan for construction from the H.D.C.

This leaves me wondering why our beach protection is at our cost when funding for a new access road to the Amberley Golf Course is being funded by HDC? The golf course is not much more elevated than the beach properties so must bear risk of sea rise/invasion. Please note we have been members of this golf club for years, & know that our baches will benefit from a new road.

I wish to speak to this submission.

21/08/26

Submission on the Proposed Coastal Relocation and Hill Development

To: Hurunui District Council
Re: Proposed relocation land and future planning for our coastal community

Introduction

I would like to begin by acknowledging the considerable work the Council has undertaken in trying to plan responsibly for the future of our coastal community.

I understand why Council is considering options for future relocation in response to coastal flooding and the potential effects of climate change. I believe it is sensible to plan ahead rather than wait until a major event forces people to make decisions under pressure.

I therefore see considerable merit in the concept of purchasing land on the hill as a potential future relocation option.

However, I believe the proposal currently lacks sufficient detail for residents to make a properly informed decision about committing $11,000 and potentially substantial additional costs in the future.

Why this matters personally

I live at the beach because I value not only my home, but the community and the special relationship we have with this place.

For many of us, our homes represent years of work, memories and investment. They are not simply buildings that can be picked up and moved somewhere else.

I also want to be able to leave something of value to my son. The proposal therefore raises important questions for me about whether the new arrangement will genuinely protect the value and future usefulness of the property for the next generation.

I appreciate that circumstances change and that we cannot necessarily preserve everything exactly as it is forever. However, if residents are being asked to invest in a relocation solution, I believe we should be confident that we are creating something that will be a genuine asset for our families rather than simply accepting an additional financial obligation because of uncertainty about the future.

This is why I am supportive of planning ahead, but would like the opportunity to understand the proposal much more fully before making that commitment.

1. The scientific basis for the proposal

One of my greatest concerns is the scientific basis for the relocation decision.

My understanding is that the modelling previously used to inform the Council's planning has subsequently been questioned as being too extreme.

If this is the case, residents need to understand what information Council is now relying upon.

I would like Council to clearly explain:

- What modelling is currently being used.
- What sea-level-rise and flooding scenarios have been adopted.
- What timeframe the Council is planning for.
- Whether the current modelling has been independently peer reviewed.
- What uncertainty remains in the predictions.
- How frequently the modelling will be reviewed.
- What would cause Council to change its approach if new scientific information becomes available.

I support sensible preparation for climate-related risk. However, when residents are being asked to make a significant and potentially irreversible financial commitment, it is reasonable to expect that the decision is based on the best available evidence.

2. What exactly does the $11,000 contribution provide?

Before residents are asked to commit $11,000, there needs to be a very clear explanation of what that payment represents.

For example:

- What legal interest does the resident acquire?
- Is the money a contribution towards land purchase, a deposit, or something else?
- Is the payment refundable if the scheme does not proceed?
- What happens if insufficient residents participate?
- What happens if the scheme is subsequently abandoned?
- Is the interest transferable to a family member?
- Can it be inherited?
- Can it eventually be sold?
- What happens if a resident changes their mind?

Most importantly, residents need to know what the **total likely cost** of participation will be, rather than simply the initial $11,000.

3. The true cost of relocation

The $11,000 contribution is only one part of the potential financial commitment.

Residents could ultimately face costs associated with:

- subdivision;
- surveying;
- roading;
- drainage;
- water and wastewater;
- electricity and telecommunications;
- earthworks;
- retaining structures;
- building a new home;
- landscaping;
- legal costs;
- development contributions;
- ongoing maintenance.

I would therefore ask Council to provide an indicative **whole-of-life cost estimate** for the development and, as far as possible, an estimate of the likely financial contribution required from an individual household.

This is particularly important for older residents and families who may simply not have the financial capacity to build another home.

4. Will residents have to pay double rates?

This is a major concern.

If the beach property remains in the resident's ownership while the hill property is also held in association with it, will residents effectively be paying for two properties?

Council should clearly explain:

- Whether rates will apply to both properties.

- Whether there will be additional targeted rates.
- Who will pay for infrastructure and maintenance on the hill.
- Whether there will be additional charges for water, wastewater, roads or other services.
- Whether the Council's existing services to the beach will continue at their current level.
- Whether residents will effectively be funding two sets of infrastructure.

These matters need to be understood before people make a financial commitment.

5. What happens to residents who cannot or do not want to participate?

This is particularly important to me because I am aware that not everyone in our community will be able to afford the proposed contribution and the much greater costs that could eventually follow.

Some people may also simply not want to leave their beach property.

Participation therefore needs to remain genuinely voluntary.

Council should clarify:

- What happens to non-participating properties?
- Will Council continue to provide normal services?
- Will there be any change to road maintenance, drainage, rubbish collection or other services?
- Could participation eventually become effectively compulsory?
- What happens if a resident cannot afford to relocate?
- What happens if a resident wishes to remain at the beach for as long as it is safe and legally possible to do so?

I would be concerned if those who could afford to participate were effectively given a different future from those who could not.

6. The future of the existing beach community

For me, this is about more than individual properties.

It is about whether we can retain a sense of community if people eventually move.

If residents are allocated different sections on the hill through a ballot, the existing community could become quite fragmented.

People have neighbours, friendships, relationships and informal support networks that have developed over many years.

I would therefore like Council to consider the **social value of keeping the community together**, rather than looking solely at the physical relocation of individual properties.

7. Fairness of the ballot system

I understand why a ballot may be necessary if there are more participants than available sites.

However, the sections may not all be equal.

Some may have better views, better access, better sunlight or considerably lower development costs.

I would like Council to explain:

- How the sites will be valued.
- Whether they have comparable development potential.
- How differences in site value will be addressed.
- Whether residents will be able to exchange sites after the ballot.
- What happens if a resident receives a site that is substantially more expensive to develop.

The allocation process needs to be demonstrably fair.

8. Protecting the sea view and our connection with the coast

One aspect of the proposal that I would strongly support is the creation of a **communal area at the front of the hill development where residents can retain access to the sea view**.

I think this could be an extremely positive part of the proposal.

For those of us who live at the beach, the ocean is part of what makes this community special. If relocation eventually becomes necessary, I would hate for people to lose that connection completely.

A shared coastal outlook could provide:

- a gathering place;
- recreation;
- community events;

- somewhere for residents without a sea view from their own section to enjoy the ocean;
- a place where the community can continue to meet.

I would strongly encourage Council to consider protecting such an area permanently as a community asset rather than allowing it to become available for future development.

In my view, this would help ensure that relocation is not simply about moving houses—it is about **moving a community while retaining something of the character and identity of the place we have called home.**

9. Ownership and inheritance

The proposal that the beach and hill sections cannot be sold separately raises important questions about inheritance.

This is particularly relevant to me because I would like to leave something meaningful and financially useful to my son.

I therefore need to understand:

- How the linked properties will be legally owned.
- Whether both interests can be inherited.
- What happens when an owner dies.
- Whether beneficiaries can sell their interest.
- What happens if children inherit the property jointly.
- Whether one beneficiary can buy out another.
- Whether the restrictions could make the combined property difficult to sell.
- Whether future generations will be able to make reasonable choices about the property.

I believe these matters should be independently reviewed by legal advisers before residents commit to the scheme.

10. What happens if circumstances change?

Climate science, technology, engineering and government policy will continue to develop.

The proposal should therefore contain clear mechanisms for review.

What happens if future modelling shows that the risk is lower than currently anticipated?

Conversely, what happens if the risk increases more quickly than expected?

I would like the proposal to be sufficiently flexible that today's decision does not unnecessarily determine the future of the community for generations.

11. The future of Council services

I believe this question needs particular attention.

Residents are understandably concerned that if Council creates an alternative settlement on the hill, there could eventually be pressure to reduce services to the beach because Council will have another area to maintain.

I would like an explicit commitment from Council about:

- road maintenance;
- drainage;
- water and wastewater;
- rubbish collection;
- emergency services;
- coastal infrastructure;
- other essential services.

Residents should not be placed in a situation where participating in the relocation scheme becomes necessary simply because services to the existing community are gradually reduced.

12. Independent assessment

Given the long-term consequences of this proposal, I believe residents would benefit from an independent assessment covering:

1. The current coastal hazard modelling.
2. The suitability of the proposed hill site.
3. Estimated development costs.
4. Likely costs to individual households.
5. Rates and infrastructure implications.
6. Insurance implications.
7. Legal ownership arrangements.
8. Effects on property values.

9. The position of residents who do not participate.
10. The future of the existing beach settlement.

Conclusion

I commend Council for having the foresight to think about these issues before a crisis occurs.

I am **not opposed to the relocation proposal**. In fact, I think the basic idea of having land available on the hill as a future option could be extremely valuable.

My concern is that residents are being asked to make a significant financial and potentially life-changing commitment before enough of the detail is known.

For me, this is ultimately about leaving something worthwhile for the next generation while also protecting the community that exists today.

I want my son to inherit something that has value and options, rather than an arrangement with restrictions and unknown future costs.

I also want the people who cannot afford to participate to be treated fairly, and I want those who choose to remain at the beach to know what their future will look like.

If relocation eventually becomes necessary, I would like us to do it well.

I would like us to create a new place where our community can continue to live, meet, look out for one another and retain its connection with the sea.

A protected communal area overlooking the ocean could be a wonderful part of that vision.

I therefore support Council continuing to investigate and plan for future coastal risk, but I respectfully ask that residents are provided with much more detailed information, independent assessment and further consultation before being required to make an irrevocable financial commitment.

Name: Rosalie Rogers
Address: 12 Holton Road
Date: 21 August 2026

Submission 108

Outlook

FW: Objection to PC7 for Rosewood Farm

[redacted]

From: Glenny Metcalfe <glenny.metcalfe@gmail.com >
Sent: Friday, 21 August 2026 6:33 pm
To: Planning <planning@hurunui.govt.nz >
Subject: Objection to PC7 for Rosewood Farm

You don't often get email from glenny.metcalfe@gmail.com. Learn why this is important

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://www.thegwpf.org/images/stories/gwpf-reports/happer-the_truth_about_greenhouse_gases.pdf)
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://vimeo.com/1116949304

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://www.1news.co.nz/2026/08/01/property-markets-longest-and-deepest-downturn-in-30-40-years/

and especially when economists have been warning of an imminent economic recession. HDC will surely expect ratepayers to cover future loses. 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 no 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.

Kind regards

Glenys Metcalfe