

Summary of submissions on Proposed Plan Change 7 - Rosewood Terrace

Note: A full copy of each submission is available at www.hurunui.govt.nz

Abbreviations Used in this Summary:

CAP	Amberley Beach Coastal Adaptation Plan
CRPS	Canterbury Regional Policy Statement
DAPP	Dynamic Adaptive Policy Pathways
District Plan	Hurunui District Plan
EIA	Economic Impact Assessment
HDC or Council	Hurunui District Council
HPL	Highly Productive Land (or highly productive rural land).
ITA	Integrated Transport Assessment
LGFA	Local Government Funding Agency
MR&LB Proposal	Managed Retreat and Land Banking Proposal
NPS-HPL	National Policy Statement for Highly Productive Land 2022
NPS-UD	National Policy Statement on Urban Development 2020
ODP	Outline Development Plan
PC7	Plan Change 7; Proposed Plan Change 7
RMA	Resource Management Act 1992

Submission #	Submitter Name	Point #	Position	Submission Summary	Decision Sought	Heard?
1	Jill Waterman	1.1	Oppose	Concerned that this is a dangerous area to add more traffic to, and that the roading layout and widening needs to be addressed before [the rezoning] should be contemplated.	This site for subdivision not to be allowed to go ahead.	No
2	Terese Erceg	2.1	Oppose	Opposed to the proposed relocation plan and the change of prime agricultural land to residential to be carved up for a housing development and relocation area for Amberley beach residence.	Reject the rezoning of rosewood to residential.	No
		2.2		Concerned that the CAP is based on extreme climate concerns and should not be used as a basis for justifying the rezoning of productive land.		
		2.3		Concerned about the costs for ratepayers if the rezoning is not successful.		
		2.4		Concerned that Amberley beach residents have never requested to be relocated and the purchase was not democratically voted on. Considers that residents can make the decision to move if the worst scenario arises.		
3	Robert Thompson	3.1	Support with amendments	Supports PC7 subject to the amendments and clarifications outlined in the submission. Considers that the proposal is a positive and necessary planning response to the long-term risks affecting the Amberley Beach settlement. Supports the principle of creating a planned, local residential option for Amberley Beach residents.	Retain the proposed rezoning of the relevant part of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone.	Yes
		3.2		Support is conditional on the relocation framework being made clearer, so that the plan change does not simply rezone land and leave the affected community uncertain about what happens next. Seeks amendments to the plan change, or formal Council commitments to ensure concerns relating to the process for relocation are addressed (including triggers, consultation, whether it is voluntary, preservation of the existing Amberley Beach community,	Retain an Outline Development Plan framework for the Rosewood Terrace development.	
		3.3			Amend the plan change provisions, policies, rules, explanatory material, Outline Development Plan provisions, or associated implementation documents to make clear that the rezoning is an enabling measure and does not, of itself, require the relocation of Amberley Beach residents.	

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		3.4		priority for Amberley Beach residents, and implementation). Considers that without greater certainty about the process beyond the rezoning, the rezoning itself may create uncertainty. Requests that the plan change should include or be supported by objective relocation triggers. [Submission includes matters that the triggers should cover]. Considers that it should be clear that the rezoning is an enabling measure and should not, by itself, mean that residents must relocate, or that relocation has already been determined. Seeks that the Council formally commit to taking all reasonable steps to keep Amberley Beach residents within the current Amberley Beach / Amberley community. [Submission includes matters the commitment should include].	Include clear, objective and evidence-based triggers for any Council decision to initiate, recommend, facilitate, or materially advance the relocation of Amberley Beach residents.	
		3.5			Require that any relocation trigger is supported by current technical evidence, publicly available information, and direct consultation with affected Amberley Beach residents.	
		3.6			Require Council to consult directly with Amberley Beach residents before any relocation pathway is activated.	
		3.7			Require Council to clearly state whether relocation is voluntary and, if not, to identify the legal basis, decision-making process and threshold for any non-voluntary relocation step.	
		3.8			Include a staged implementation framework that recognises that different parts of Amberley Beach may face different hazards, different timing issues, and different levels of risk.	
		3.9			Include a formal commitment that Council will take all reasonable steps to ensure that Amberley Beach residents are able to remain within the current Amberley Beach / Amberley community.	
		3.10			Provide existing Amberley Beach residents with priority access, or a clearly defined allocation pathway, within the Rosewood Terrace development if relocation becomes necessary or desirable.	
		3.11			Ensure that the design, staging and allocation of the Rosewood Terrace development supports community cohesion, neighbour relationships, accessibility and continuity of the existing Amberley Beach community.	
		3.12			Require transparent reporting to affected residents on infrastructure costs, servicing, rating impacts, development contributions, lot pricing, affordability measures and any resident contribution requirements.	
		3.13			Require any implementation or relocation framework to recognise the circumstances of older residents, vulnerable residents, residents on fixed incomes and residents who may face practical or financial barriers to relocation.	
		3.14			Require Council to adopt or public a relocation implementation framework before any relocation pathway is activated.	
		3.15			Make any further, alternative or consequential amendments necessary to give effect to this submission.	
4	C L Ford	4.1	Oppose	Concerned about costs being passed onto ratepayers. Considers that Amberley does not need more subdivisions.	The proposed development should be squashed and not go ahead.	No
5	Colin McCulloch Black	5.1	Oppose	Concerned about permanent loss of HPL.		Yes

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		5.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.	Decline Plan Change 7 in full, retaining the Rural Zone over the site.	
		5.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.	Require Council to reassess relocation options using updated, evidence-based climate hazard modelling.	
		5.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.	Protect highly productive rural land from unnecessary rezoning.	
		5.5		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.	Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth. Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	
6	Gerard McNeill	6.1	Support	Supports the subdivision and wants the new land.	Provide information on when the new land is available so that plans can be made to move.	No
7	Canterbury Regional Council	7.1	Support	Supports the plan change, as it supports the relocation of the Amberley Beach residents currently subject to natural hazard risk.	Not stated.	No
		7.2		Considers that the proposal is generally consistent with the objectives and policies within the CRPS, including Objectives 5.2.1, 5.2.3, 9.2.1, 11.2.1 & 11.2.3 and Policies 5.3.1, 5.3.5 & 5.3.7.		
		7.3		Notes that the regional council's Natural Hazards Science staff have reviewed Appendix E – Preliminary Geotechnical Appraisal and have noted no issues, and agree with its findings.		
		7.4		Notes that although some activities may be permitted, there may be requirements for resource consents under relevant regional plans administered by the regional council at the time of any subdivision application.		
8	William & Hilary Turnbull	8.1	Oppose	Concerned about additional increase in traffic on Hursley Terrace Road, and the safety hazards arising at key intersections.	Decline Plan Change 7 in its entirety. If the subdivision plan above does go ahead, do not promote Newcombes Road as public beach access, with clear signage of NO BEACH ACCESS, NO STOPPING and NO PARKING.	No
		8.2		Considers that the effect of rezoning HPL to residential land has not been properly addressed by the plan change and is concerned about complaints from new residents unfamiliar with rural life placing pressure on farming operations.		
		8.3		Concerns about the increase in stormwater flows arising from increased impervious surfaces on low-lying properties located to the east of the site, potentially increasing the frequency, depth and duration of flooding on existing private land.		
9	Carol Carvell	9.1	Oppose	Opposes the plan change due to the lack of consultation and support from the Council. Concerned that relocation would scatter the current community. Seeks information whether homeowners would need to pay for relocation of houses or building a totally new house, noting that many live in houses that were not designed to be moved.	[Retain] rural [zoning].	Yes
10	Linda Constable	10.1	Oppose	Considers that as there is no immediate threat of inundation requiring the population to move, the council should be prepared to pause the process so that the residents can better consider their response and not feel rushed, the subdivision plan can be designed in tandem with the rezoning, and taking into account the timing of local government reform.	That the Plan change be paused until: 1. The defects in consultation be remedied as described.	No

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		10.2	Oppose	Considers that to date, consultation with the residents has been less than adequate. Suggests that an independent consultant is engaged by the Council to ascertain the views of each household on the Plan Change.	2. The Plan change not be progressed until the Subdivision Application is advanced concurrently. 3. That the opt-in proposal be better explained to residents along with conditions and dates and that the Council prepare a legal template which residents can use to show that an opt-in section becomes part of their estate and that they, or their beneficiaries can inherit it.	
		10.3	Oppose	Raises questions about the relocation process, including timing of opting-in, how allocation of sections will work, consideration of impact of people not opting in, and how changes in ownership during the process will be managed. Concerned that the proposal does not provide for the wellbeing of the residents in its current form.		
11	Lydia Saunders	11.1	Oppose	Opposes the plan change as not being in the best interest of the wider community and infrastructure.	Not stated.	No
12	Margaret Hedge	12.1	Oppose	Considers that rural/productive land should and must be retained for future food production, and that Amberley does not have the infrastructure to absorb this plan, with the cost to the ratepayer being unsustainable.	Not stated.	No
13	Barrie Nunn	13.1	Oppose	Questions the plan change purpose as it relies on modelling and assessments the current Government has instructed councils to disregard.	Rejection of the proposed plan to rezone and a moratorium on any further expenditure by HDC on this plan until the Government restructure is complete.	No
		13.2		Considers that PC7 has the potential to be used as undesired precedent when other blocks of productive land are being considered for use for alleged Climate or environment reasons.		
		13.3		Concerned that productive land once built upon will be lost forever and considers that it is current HDC policy to not build on productive land and there has been no public discussion about the change to that policy.		
		13.4		Considers that the timing of [PC7] is forcing a decision where no provable timeline is available to warrant haste, especially when councils are being restructured and will not be around in the current form in a couple of years to deal with the consequences.		
		13.5		Concerned that the HDC management of the retreat process has the potential to expose Ratepayers to liability if a class action is taken by Amberley Beach residents who see the value of their properties adversely impacted by HDC implementation of this policy.		
14	Laura & David Proctor	14.1	Oppose	Concerned about what PC7 actually enables and that it is out of sequence with the implementation pathway the community agreed in the CAP and the MR&LB Proposal, as none of the triggers in the CAP have been met.	Decline the proposed rezoning of 185 Ashworths Road from Rural Zone to Residential 1 Zone.	No
		14.2		Does not believe this rural land should be rezoned for a development of around 230 houses, as this will permanently change the character and landscape of the area.		
		14.3		Understands that there are serious coastal issues affecting Amberley Beach and that Council needs to think about the future, but does not believe those issues automatically justify rezoning such a large area of rural land. Feels that alternative options have not been seriously considered that would support the community to stay where it is rather than relocate.		
		14.4		Considers the CAP should be properly reviewed and the community consulted again before such a major change to the surrounding landscape is made, as the community and circumstances have changed.		
		14.5		Concerned about the personal impact of the uncertainty around the future of Amberley Beach, and the financial impact.		
15	Christina Bately	15.1	Oppose	Opposes rezoning from rural to residential and the proposal to move beach residents from the beach to the plan change site, as does not want to, or have the financial ability to move.	[Reject] the rezoning from rural to residential and moving beach residents.	No

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16	Jessica Caddy	16.1	Oppose	Concerned about effects of wastewater, stormwater, and accessible clean water affecting the properties below the terrace including Rural and Amberley Beach settlement as well as the marine life in the lagoon and ocean.	Decline Plan Change 7 – Rosewood Terrace.	No
		16.2		Considers that the location of the land is not suitable for the purpose of a relocation due to issues that would affect the surrounding rural and beach property owners, including servicing, construction, traffic, light pollution and noise levels, and access/distance to local amenities.		
		16.3		Concerned that the triggers in the CAP are not being executed the way the community believed they would be, and the land use change is skipping ahead.		
		16.4		Concerned about the lack of legal agreement between HDC and the current homeowners of Amberley Beach.		
		16.5		Concerned about the costs of consenting and building on the new land and the removal and clearance of dwellings at the Beach, and it being unattainable for most of the community, meaning relocation is technically available but financially inaccessible.		
		16.6		Concerned that the ballot system may result in beach residents being spread out.		
		16.7		Concerned that approving the plan change makes an assumption that relocation is the preferred or inevitable outcome regardless of triggers being met, and that it will create unintended consequences with how Beach properties are viewed, discouraging investment in maintenance and improvements.		
17	Scott Caddy	17.1	Oppose	Concerned about effects of wastewater, stormwater, and accessible clean water affecting the properties below the terrace including Rural and Amberley Beach settlement as well as the marine life in the lagoon and ocean.	Decline Plan Change 7 – Rosewood Terrace.	Yes
		17.2		Considers that the location of the land is not suitable for the purpose of a relocation due to issues that would affect the surrounding rural and beach property owners, including servicing, construction, traffic, light pollution and noise levels, access/distance to local amenities, and the terrace not being suitable for existing homes to be relocated under the building codes.		
		17.3		Considers that Amberley Township does not have capacity and infrastructure to handle additional subdivision at this time, including medical and emergency services, police resources, public transport and school zones.		
		17.4		Concerned about public safety & road hazard management in relation to the SH1/Hursley Terrace Road intersection and unsustainability of Mill Road for multi traffic movements, and the use of the secondary plan change access becoming the main route.		
		17.5		Concerned that the triggers in the CAP are not being executed the way the community believed they would be, and the land use change is skipping ahead.		
		17.6		Concerned about the lack of legal agreement between HDC and the current homeowners of Amberley Beach.		
		17.7		Concerned about the costs of consenting and building on the new land and the removal and clearance of dwellings at the Beach, and it being unattainable for most of the community, meaning relocation is technically available but financially inaccessible.		
		17.8		Concerned that the ballot system may result in beach residents being spread out.		
		17.9		Concerned that approving the plan change makes an assumption that relocation is the preferred or inevitable outcome regardless of triggers being met, and that it will create		

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				unintended consequences with how Beach properties are viewed, discouraging investment in maintenance and improvements.		
18	George & Laura Palomino Forbes	18.1	Oppose	Concerned that PC7 would result in an incompatible and dense residential subdivision that would fundamentally and irreversibly alter the established rural, social and environmental character that is so important to the surrounding community.	Withdraw Proposed Plan Change 7 and commit not to re-submit a zoning change for the relevant land in connection with Amberley Beach Proactive Relocation.	Yes
		18.2		Considers that the notified s32 evaluation has been insufficient and does not meet the heightened analytical rigour or multi-criteria analysis of the evaluation required for this “novel” and complex plan change proposal. Considers that it fails to provide the level of detail and rigour required for a proposal of this scale and significance, does not adequately identify or assess reasonably practicable alternatives, and improperly characterises severe localised effects as low-moderate.	If the plan change is not withdrawn, reject all changes in Proposed Plan Change 7 in its/their entirety. If Proposed Plan Change 7 is approved in any form, impose conditions under s77D(a) of the RMA, requiring mandatory public notification with public submissions for subsequent resource consent applications associated with Plan Change 7.	
		18.3		Concerned that PC7 has been notified prior to processes anticipated under the CAP, completing due diligence, undertaking consultation and independently assessing the project's financial viability.	Apply the following process safeguards:	
		18.4		Concerned that certain statements and community assurances [listed in submission] in the MR&LB Proposal risk being undermined by PC7.	- <i>Maintain an Open Mind</i>: Ensure summarising and hearing submissions have ‘enhanced independence’ from Council.	
		18.5		Considers that the land purchase and proposed rezoning have created momentum that impairs “go/stop” decision-making by Councillors.	- <i>Plain Language Summaries</i>: Provide accessible summaries of technical reports for community members without specialised expertise.	
		18.6		Considers that a substantial majority of Amberley Beach residents and all residents living in the Hursley Terrace Environment oppose PC7 and the proposed residential development; and that in the absence of actual demand, the assessment of costs and benefits is flawed.	- <i>Procedural fairness</i>: implement principles that apply (by analogy) to private landowners involved in Public Works Act matters (accepting the absence of land acquisition here) and fund a group or groups of submitters to engage professional advisers, comparable to those advisers engaged for the Council, to enable effective and fair public participation.	
		18.7		Considers that the rezoning would mark the beginning of the end for the Amberley Beach township, and that the voluntary approach would be increasingly constrained by institutional and market forces, such as reduced service levels and insurance and banking changes. Concerned that the institutional momentum that PC7 creates will erode freedom of choice for residents and property owners at Amberley Beach and in the Hursley Terrace Environment in the future.	- <i>Full Disclosure</i>: Confirm all reports and advice relied upon have been disclosed; and commit to disclosing any further information during the process with adequate opportunity to respond before decisions are made.	
		18.8		Considers that the evaluation of the impact of PC7 on the residents of the Hursley Terrace Environment has not received sufficient rigour.	- <i>Resource Consenting submissions</i>: volunteer a public submission process, if submissions are not statutorily required, as part of PC7 (should it be approved) in relation to later resource consent applications for the Proposed Site.	
		18.9		Concerned about the resource and experience disparity between the Council (as the proponent and advocate for PC7) and submitters in this process, including the limited time to make submissions, and the lack of opportunity for input/ submissions on future subdivision proposals.		
		18.10		Considers that PC7 undermines the CAP’s trigger-base adaptive planning framework, by committing substantial public resources and advancing a preferred pathway before the community has reached the decision point contemplated by the CAP. Concerned that the Council's financial commitments create pressure on the community that undermines genuine voluntariness.		
		18.11		Considers that there is a reliance on cost-neutrality and that If the cost neutrality objective were removed or significantly modified, the legal justification for the rezoning (particularly the rezoning of HPL) would be materially weakened. Considers that the EIA report does not address a variety of foreseeable risks and liabilities that affect cost neutrality. Concerned that		

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				the combination of omitted financial matters [detailed in the submission] is unsatisfactory, the EIA is inadequate for PC7 and no financial viability assessment of PC7 has been undertaken.		
		18.12		Concerned that consideration of the transformation of the rural amenity and character of the Hursley Terrace Environment is largely absent or materially understated by the evaluation.		
		18.13		Concerned that the landscaping provisions in PC7 contain several material shortcomings that may compromise the effectiveness of the mitigation planting and create uncertainty regarding long-term maintenance and costs; that there is significant risk that the intended landscape and visual mitigation will not be achieved or sustained; and that the severe impact on some parts of the Hursley Terrace Environment does not make those effects acceptable under the RMA or otherwise.		
		18.14		Considers that the visual connection to the coastal environment is legally significant to PC7 but that the preservation of this visual connection (between the site and the ocean) is not secure.		
		18.15		Considers that the section 32 evaluation is deficient because it fails to assess the environmental, economic, social, and cultural effects of the construction phase on the Hursley Terrace Environment.		
		18.16		Considers that the Plan Change site will give rise to reverse sensitivity effects on surrounding farm production, and on farmers and lifestyle block owners that have not been appropriately addressed.		
		18.17		Concerned that the traffic assessment underestimates the level of traffic accessing Hursley Terrace, including during construction, and that PC7 would fundamentally alter the current road characteristics; and that there is no assessment of effects on Newcombes Road and Kowai River Road.		
		18.18		Considers that the Infrastructure Assessment's reliance on future detailed design to resolve fundamental infrastructure issues creates significant uncertainty about development feasibility and cost-neutrality.		
		18.19		Considers that PC7 is contrary to the NPS-HPL, and that robust consideration of costs, benefits and trade-offs when urban rezoning is proposed on HPL has not occurred.		
		18.20		Considers that PC7 and the basis for it does not comply with the directive from the Minister for Climate Change and Local Government in relation to climate change metrics.		
		18.21		Concerned that PC7 attempts to cherry-pick elements of the NPS-UD but ignores associated essential principles and objectives of it. Considers PC7 to be contrary to Objectives 1 & 3 and Policies 1, 5, 6 and 8.		
		18.22		Considers that PC7 is fundamentally inconsistent with and fails to implement essential parts of the District Plan [submission lists provisions].		
		18.23		Considers that PC7 fails to give effect to parts of the CRPS.		
		18.24		States that the "coastal environment" is not defined by District Plan mapping and PC7 fails to consider or give effect to the New Zealand Coastal Policy Statement, including the precautionary approach principle.		
		18.25		Considers that PC7 is contrary to the purpose and principles of the RMA.		

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		18.26		Considers that limiting public participation in a development of this “novel” character, in terms of later resource consents relating to the site, is inappropriate. Considers that further mandatory public notifications are required if PC7 progresses, which are provided for under s77D of the RMA.		
19	Jackson Aitken	19.1	Oppose	Opposes PC7 and the current approach to the CAP. Is not opposed to planning for the future of Amberley Beach, but is opposed what appears to be a rushed approach that could leave existing homeowners financially worse off without clear evidence that the time has come to take this step.	Slow the process down, clearly demonstrate that the relevant triggers have been reached, properly assess the financial impact on existing homeowners, and clearly identify who is carrying the financial risk of the proposed development.	No
		19.2		Understands and appreciates that Amberley Beach has coastal risks and that Council needs to plan ahead, but is concerned that Council seems to be pushing ahead with a major subdivision and relocation plan before it has been properly demonstrated that the relevant triggers in the CAP have actually been reached.	Clearly explain: - What does “cost neutral to the wider community” actually mean? - Who is responsible if the development costs more than expected? - Have the financial losses and costs to existing Amberley Beach homeowners been properly assessed? - Why is this major subdivision being progressed now if the adaptation process is meant to be trigger-based?	
		19.3		Concerned about the statement that the development will be “cost neutral to the wider community” and that existing homeowners could face significant financial losses through this process. Concerned that it is not financially viable to trade an existing house and section for an \$11,000 section much further away from the beach and town. Does not believe it is fair to describe the overall proposal as cost neutral if a significant financial burden is effectively placed on individual homeowners.	Before rezoning is confirmed, clearly identify: - What the relocation triggers are and whether they have been reached; - The evidence supporting the need to relocate now; - How the consultation process will work; - Whether relocation is genuinely voluntary; - Who will pay for the relocation and associated costs; - How existing residents will be protected from being financially disadvantaged; - How the new lots will be allocated; - Whether existing Amberley Beach residents will receive priority; and - How affordability will be addressed.	
		19.4		Questions whether approximately 230 new sections are justified at this stage, and whether other options have been properly considered before committing to such a large development.		
20	Louise (Lulu) Webb	20.1	Oppose	Opposed to any outcome that amends existing provisions in the Hurunui for the protection of HPL. Considers that without the basis stated for pro-active re-location the proposed development plan would never have met the Council Policy on HPL. Considers that there is no national precedent for changing the status of HPL based on a climate change and proactive relocation rationale.	Decline the Plan Change request.	No
		20.2		Concerned that a housing development in Ashworth’s Road has never been in the Long-term Plan and land to the east of Amberley has been identified for growth.		
		20.3		Notes that the basis for the LGFA development funding was to provide Amberley Beach residents with an agreed pathway to eventual re-location once certain triggers were reached, and that the purchase of the land was intended to be “kept in reserve” as land banking – so that as triggers within the CAP happened in due course planning would be agreed with the wider community and the Amberley Beach residents.		

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		20.4		Concerned about the use of extreme climate forecasting scenarios as the basis of the Council's forecasting and considers that the CAP needs to be re-visited in light of advice from Minister for local government and the United Nations Scientific body on climate change.		
21	Gordon Legge	21.1	Oppose	Concerned about forcing a group of residents to be relocated in mass, and considers that as Amberley Beach residents bought there of their own free will, they should be allowed to remain. Considers that the concept should not have been allowed to proceed without the total support of residents.	Reject the plan change.	Yes
		21.2		Concerned that the Council has opened itself up to the prospect of a class action by the residents, due to the impact on property values, and that while there is climate change, there is no evidence of flooding due to rises in sea level. Considers that there is no just cause for this proposed development and therefore no justification for the proposed zoning change.		
		21.3		Considers that this type of activity is not a core activity that the government has said councils should stick to, that councils are not property developers, and have no expertise and no mandate to take undue risks with ratepayers money.		
22	Josi Hamill	22.1	Support	Supports PC7, as the rezoning allows for a managed retreat of the Amberley Beach Settlement inland, away from increasing risks associated with climate change. Considers that this provides more options for residents, council, and business owners to respond to environmental challenges in a way that protects the existing community, creates opportunities for growth, and increases the resilience of the natural heritage in a changing environment.	Not stated.	No
		22.2		Considers that the property is in a suitable location, as it is not at risk of flooding or coastal hazards, close enough to the coast to retain a sense of 'beach culture', accessible to amenities, local businesses, and natural features, and large enough to create opportunities for growth.		
		22.3		Recommends coastal wetland regeneration and strengthening of mitigation infrastructure in the interim to mitigate short-to medium-term impacts of erosion and coastal hazards, and to provide time for residents to relocate.		
23	David & Jenny Uren	23.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full, retaining the Rural Zone over the site. Require Council to reassess relocation options using updated, evidence-based climate hazard modelling. Protect highly productive rural land from unnecessary rezoning. Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth. Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	No
		23.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.		
		23.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.		
		23.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.		
		23.5		Concerned about the impact of additional traffic on Hursley Terrace Road, and that the lack of public and active transport options and amenities.		
		23.6		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.		
24	Trevor Brown	24.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full, retaining the Rural Zone over the site.	No
		24.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.		

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		24.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.	Require Council to reassess relocation options using updated, evidence-based climate hazard modelling.	
		24.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.	Protect highly productive rural land from unnecessary rezoning.	
		24.5		Concerned about the impact of additional traffic on Hursley Terrace Road, and that the lack of public and active transport options and amenities.	Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth.	
		24.6		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.	Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	
25	Bruce James Johns	24.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full, retaining the Rural Zone over the site.	No
		24.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.	Require Council to reassess relocation options using updated, evidence-based climate hazard modelling.	
		24.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.	Protect highly productive rural land from unnecessary rezoning.	
		24.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.	Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth.	
		24.5		Concerned about the impact of additional traffic on Hursley Terrace Road, and that the lack of public and active transport options and amenities.	Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	
		24.6		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.		
26	David & Vicki Sanford	24.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full, retaining the Rural Zone over the site.	No
		24.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.	Require Council to reassess relocation options using updated, evidence-based climate hazard modelling.	
		24.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.	Protect highly productive rural land from unnecessary rezoning.	
		24.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.	Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth.	
		24.5		Concerned about the impact of additional traffic on Hursley Terrace Road, and that the lack of public and active transport options and amenities.	Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	
		24.6		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.		
27	Lorraine Dunning	24.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full, retaining the Rural Zone over the site.	No
		24.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.	Require Council to reassess relocation options using updated, evidence-based climate hazard modelling.	
		24.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.	Protect highly productive rural land from unnecessary rezoning.	

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		24.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.	Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth. Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	
		24.5		Concerned about the impact of additional traffic on Hursley Terrace Road, and that the lack of public and active transport options and amenities.		
		24.6		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.		
28	Julie Nunn	28.1	Oppose	Questions the purpose of PC7 as it is not based on current government approved modelling and assessment, and has the potential to be used in other circumstances where alleged climate change and environmental requirements are perceived as necessary.	A full rejection of Plan Change 7 and a moratorium on expenditure by HDC on this Plan change until the Government's council restructuring is complete.	No
		28.2		Concerned about the detrimental impact on the district from productive land being given away to housing, and believes this is against stated HDC policy to build on productive land.		
		28.3		Opposed to the timing of the [plan change], as considers that there is no proven timeframe which shows the need to make any hasty decisions, and that as councils are disbanded and merged it is not a good time to push this change through.		
		28.4		Considers that the way the plan change has been managed could potentially leave rate payers being held liable for class actions as the value of Amberley Beach properties are severely impacted by HDC implanting this policy.		
29	Laura Fairbrass	29.1	Oppose	Concerned about permanent loss of HPL, lack of consideration of alternates, and that the benefits of this plan change do not outweigh the loss of productive land and the precedent it may set for further rural-to-residential rezoning around Amberley.	Decline Proposed Plan Change 7 – Rosewood Terrace. If the plan change is not declined, amend it to provide stronger protection for productive rural land, clearer limits on development, and binding requirements for transport and infrastructure upgrades to be completed and funded before development proceeds. Publicly notify any future resource consents sought for subdivision, earthworks, infrastructure upgrades, stormwater works, roading changes, beach access, or residential development associated with this project.	Yes
		29.2		Concerned about the impact of additional traffic on the surrounding local road network, including road safety, amenity, travel times for existing residents and road users, and on Beach access via Newcombes Road.		
		29.3		Concerned about whether existing and planned infrastructure can adequately support the proposed development, and considers the plan change should not transfer infrastructure costs, risks, or long-term maintenance burdens to the wider community.		
		29.4		Concerned that the plan change would alter the character of the area, may adversely affect the amenity, expectations, and ongoing use of neighbouring rural properties, and would erode the rural identity of Rosewood Terrace and the wider Amberley rural area.		
		29.5		Concerned that residential development of this scale could increase hard surfaces and stormwater run-off, which may worsen existing drainage and flooding issues in the area.		
		29.6		Concerned that the proposed rezoning and development could result in the loss, fragmentation, or disturbance of habitat for native birds and lizard.		
		29.7		Concerned that the location is not suitable for a substantial increase in domestic cats and dogs associated with residential development, and the impact these domestic animals could have on nearby rural properties, stock, native birds, lizards, and other wildlife.		
		29.8		Concerned that Council's logic for enabling this rezoning as part of managed retreat for Amberley Beach residents appears to rely on a report that was not intended to be used in this context, and that the report may no longer be current or applicable.		

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		29.9		Concerned about the impact and disruption that required infrastructure upgrades would have on current rural residents, including noise, dust, vibration, traffic disruption and reduced access.		
30	Alan James Wilkinson	30.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full, retaining the Rural Zone over the site. Require Council to reassess relocation options using updated, evidence-based climate hazard modelling. Protect highly productive rural land from unnecessary rezoning. Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth. Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	No
		30.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.		
		30.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.		
		30.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.		
		30.5		Concerned about the impact of additional traffic on Hursley Terrace Road, and that the lack of public and active transport options and amenities.		
		30.6		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.		
31	Wayne Gregory Sargent & Jennifer Linley Chisnall	31.1	Oppose	Concerned about reverse sensitivity risks from new residents unfamiliar with rural life or less tolerant of effects from lawful, pre-existing rural activities.	Decline Plan Change 7 in full, retaining the Rural Zone over the site. Require Council to reassess relocation options using updated, evidence-based climate hazard modelling. Protect highly productive rural land from unnecessary rezoning. Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth. Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	Yes
		31.2		Concerned about the irreversible loss of HPL and that this is contrary to Objective 3.1 and Policy 3.2 of the District Plan and to the NPS-HPL.		
		31.3		Considers that aspects of the s32 assessment are flawed; and that it has not sufficiently addressed other reasonably practicable options for achieving the objectives.		
		31.4		Considers that the full extent of visual effects experienced from the submitter's property are illustrated in Appendix D, but have been understated in the documentation, and will have a severe impact on the submitter's lives.		
		31.5		Considers that the sea view cannot be guaranteed or relied upon as a permanent or justifiable reason for purchasing the land.		
		31.6		Concerned that housing will severely exacerbate instability, and that the proposed setbacks from Hursley Terrace Road are insufficient.		
		31.7		Considers that the Infrastructure and Servicing Assessment contains several material deficiencies [listed in submission].		
		31.8		Considers that limiting public participation in a development of this "novel" character, in terms of later resource consents relating to the site, is inappropriate. Considers that further mandatory public notifications are required if PC7 progresses, which are provided for under s77D of the RMA.		
		31.9		Concerned that PC7 would fundamentally alter the current characteristics of Hursley Terrace Road, including the ability to safely manage stock movements across the road; and that there is no assessment of effects on Newcombes Road and Kowai River Road.		
		31.10		Considers that creation of a new residential area remote from Amberley does not meet NPS-UD minimum requirements.		

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		31.11		Considers that PC7 is inconsistent with Chapter 13 (Indigenous Biodiversity) of the District Plan.		
		31.12		Concerned about the financial impact on ratepayers arising from the project not becoming cost-neutral until 2055.		
		31.13		Considers that the s32 evaluation does not sufficiently address the effects of the construction phase on neighbours; and that the s32 assessment is flawed. Does not consider PC7 to be the most appropriate way to achieve the purpose of the RMA.		
		31.14		Considers that PC7 fails to give effect to the CRPS.		
		31.15		Considers that PC7 poses a direct threat to the submitter's farming business, livelihood, way of life and mental well-being, and considers the significant uncertainties around the proposal and adverse impacts mean it is inappropriate, and should be declined.		
32	Grant & Sharon Benns	32.1	Oppose	Concerned that land purchase has occurred instead of relocation only being considered after one or more major emergency events occurring within 30 years. Considers that rather than relocating the community, Council should first consider practical ways to protect and improve Amberley Beach, with improvements undertaken to attract visitors to generate revenue for ongoing improvements, to help Amberley Beach become more resilient, more useful to the wider district, and more financially sustainable.	Invest in Amberley Beach. Let residents stay, build proper coastal protection, and restore the community's voice.	Yes
		32.2		Considers that the site is unsuitable because it is farmland surrounded by other farmland and far from the beach environment.		
		32.3		Concerned that relocation would place a major financial burden on households, forcing people to move homes and clear sections miles from the beach. Considers that Council's control over rates, valuations, and services gives it significant influence over residents' choices.		
33	Darren Reed & Sheryl Smith	33.1	Oppose	Opposes the specific provisions around rezoning and relocation of Amberley Beach settlement, and does not believe the Council should be involved in the business of property development.	To not allow rezoning of 185 Ashworths Road, Amberley.	Yes
34	Giles Gormack	34.1	Oppose	Opposes the PC7 in its entirety. Concerned that the loss of HPL contradicts the Council's plan to protect rural land for productive use. Considers that the expansion of Amberley should adjoin the township rather than a random subdivision in the middle of rural land.	Decline Plan Change 7 in full and retain the rural zone.	Yes
		34.2		Considers that the subdivision is not necessary as there is no immediate danger, if at all, to Amberley Beach.		
		34.3		Questions whether the council intends to develop the rest of the property in future.		
		34.4		Concerned about the effects on existing rural landowners, as considers that the placing of approximately 230 homes in a rural area will cause complaints of noise, smell, dust and heavy machinery which are part of every day rural production.		
		34.5		Concerned about traffic impacts resulting from a huge increase in traffic, and the current standard of Hursley Terrace Road and the intersections of Hursley Terrace and Crosses Road with State Highway 1.		
		34.6		Questions whether the Council has a conflict of interest by being the developer and overseeing the development. Concerned that the Council are using ratepayers money and have commercial pressure to approve the plan to move forward.		
35	Miriam Lucy Bartlett	35.1	Oppose	Concerned about using up productive fertile land for housing.	[Reject the plan change.]	No

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		35.2		Concerned about the unmanageable cost to residents to relocate to Rosewood, and that the proposal will not be “cost neutral” to residents of Amberley Beach, due to costs of clearing sections, building at Rosewood, connecting to services and moving costs.		
		35.3		Concerned about the effects of the suggested relocation on the mental health and well-being of the Amberley Beach community and on its cohesiveness. Concerned that most residents do not want to move, and that the plan has produced disquiet and fractiousness among residents.		
		35.4		Concerned about the haste of the decision and the fishhooks in the plan that residents might not fully comprehend due to number and complexity of documents.		
		35.6		Concerned about the lack of certainty about the process that authorities will pursue in relation to managed retreat, given local and national government changes.		
		35.7		Concerned that the information on which the CAP was based was a worst case scenario, and the effects of climate change are now predicted to be less severe.		
36	Roseanne Hinton & Michael Tayles	36.1	Oppose	Concerned that the proposed development would fundamentally change the character of the community, and impose significant effects that have not been adequately assessed on existing residents who have had limited consultation.	Decline Plan Change 7 and retain the land in the Rural Zone. Undertake a genuine assessment of all reasonably practicable and feasible alternative locations.	Yes
		36.2		Concerned that PC7 would permanently remove 37ha of LUC1 and LUC2 rural land from primary production without adequate consideration of alternative locations. Questions whether development would proceed regardless of whether the intended relocation occurs, and therefore whether the permanent loss of HPL is genuinely necessary to achieve the stated managed-retreat objective.	Require independent traffic and road safety, stormwater, and flowing assessments. Protect existing farming operations from reverse sensitivity effects.	
		36.3		Concerned that reverse sensitivity effects from existing farming activities in the surrounding area have been underestimated and considers that existing farmers should not be expected to change legitimate farming practises to accommodate an introduced residential environment.	Prevent Newcombes Road from becoming the formal or informal beach access route for Rosewood Terrace. Require comprehensive ecological assessment and protection of native wildlife.	
		36.4		Concerned that traffic and road safety have not been adequately assessed; that Hursley Terrace is designed for rural use, with the proposal fundamentally altering its character and function, and that its use by future residents has been underestimated; and other traffic movements have been underestimated. Considers independent safety assessment should be undertaken for specified intersections and roads.	Ensure all infrastructure upgrades are fully funded by the development and not existing rural ratepayers. Do not approve any Rosewood plan change or land-use change until adequate social and physical infrastructure is demonstrably planned, funded and capable of supporting its growth, with any additional costs appropriately attributed to the development and its future residents, rather than the wider Hurunui ratepayer community.	
		36.5		Considers that Newcombes Road should not be used to provide beach access, due to its nature, usage and lack of facilities, and part of the access being across private land. If any beach access is provided, the submitter considers it should be purpose-designed, fully funded and maintained by the development.	Ensure public participation continues through future significant consent processes.	
		36.6		Concerned about the impact of additional impermeable surfaces on flooding and drainage issues, and considers that independent hydrological modelling should be undertaken demonstrating no increased flooding risks on downstream owners.		
		36.7		Concerned about the impact of development and introduction of domestic animals on native biodiversity.		
		36.8		Concerned about permanent transformation of the character of the surrounding rural environment from increased lighting, noise, traffic, construction activities, domestic animals and urban infrastructure.		

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		36.9		Concerned about light pollution resulting from new artificial lighting.		
		36.10		Concerned about the lack of comprehensive planning for social and physical infrastructure required to support the scale of cumulative growth in Amberley.		
		36.11		Considers that construction phase impacts have not been adequately assessed, and should be clearly assessed before rezoning occurs, rather than deferred to future resource consent processes.		
37	Linda & Ian Tayles	37.1	Oppose	Concerned about the loss of HPL, and that insufficient weight has been given to the long-term value of this land for food production and rural character.	That Proposed Plan Change 7 be declined.	Yes
		37.2		Concerned about the increase in traffic, particularly additional right-turn movements from SH1 into Hursley Terrace, and consider that traffic effects have been underestimated.		
		37.3		Concerned about lack of pedestrian and cyclist facilities along Hursley Terrace, and considers that it should be upgraded to provide safe facilities, with the road widened as necessary and consideration given to reducing the speed limit.		
		37.4		Concerned about sufficient social infrastructure (such as medical services, schools and emergency services) not being in place to support the scale of growth proposed for Amberley, including Rosewood along with other developments.		
38	Vanessa McPherson	38.1	Oppose	Considers that the Council has not established a sufficiently reliable, current and community-supported basis for converting HPL into an approximately 230-lot residential subdivision at 185 Ashworth's Road. The proposal rests on a contested CAP, assumes community support that has not been established, relies on additional market lots to fund the retreat, and does not demonstrate that alternatives have been properly considered. Concerns include: - That previous consideration of the hazards through the CAP does not establish that the assumptions underlying the CAP remain sufficiently reliable, or that the retreat model now proposed is necessary. - That PC7 and the EIA both proceed on the premise that the community will relocate as a whole; and cannot be treated as a settled planning or economic requirement when it has not itself been established. - Lack of certainty about the level of uptake from residents, and therefore the alignment of the proposal with clause 3.6(4)(a) and cl 3.6(5) of the NPS-HPL. - That PC7 relies on the CAP (and in turn on the Jacobs assessment as an evidential foundation) to support the proposed retreat pathway and associated rezoning. Given the significance of that evidence to PC7 and the magnitude of the decisions now proposed, questions whether Council can continue to rely on the CAP, without an independent assessment of the evidence and assumptions underpinning it. - That Councils have been cautioned against automatically treating SSP5-8.5/RCP8.5 as the central or most likely future when making decisions affecting infrastructure investment, land use, property rights, or rates, which is directly relevant to s 32(2)(c) of the RMA. - Whether Council has maintained an open and evidence-based process, or whether the retreat has become the predetermined outcome against which each subsequent decision has been made.	Decline PC7 in its current form. In the alternative, do not approve the proposed rezoning unless Council first demonstrates: 1. Necessity: why the proposed rezoning is necessary to provide the development capacity required to meet expected demand under cl 3.6(4)(a) of the NPS-HPL, having regard to the actual and likely uptake by Amberley Beach residents; 2. Minimum area: why approximately 34 hectares is the minimum area of HPL necessary to provide that capacity, as required by cl 3.6(5); 3. Market lots: why the proposed additional market lots are necessary for the purposes of cl 3.6(4)(a), rather than principally being required to subsidise or achieve financial neutrality for the retreat; 4. Alternatives: why there are no other reasonably practicable and feasible options, including options involving a different scale, timing, location or structure of the proposed retreat; 5. Evidence base: independently review whether the evidence and assumptions underpinning the CAP remain sufficiently reliable, current and fit for purpose to support the proposed rezoning, including the treatment of climate-risk scenarios. Any review of the Jacobs report should be undertaken by an independent expert with no involvement by Jacobs, given the	Yes

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				Notes the requirements in Clauses 3.6(4)(a) and 3.6(5) of the NPS-HPL, and queries: - the impact that the uncertainty of uptake has; - whether the requirements on which the assessment of other reasonably practicable and feasible options are based have been properly established; - whether reducing Council's financial risk, together with benefits that remain unproven and, in part, self-created through Council's own hazard framework, is sufficient to justify the permanent loss of HPL.	report's central role in the CAP and the significance of the decisions stemming from it. 6. Community uptake: what level of participation by Amberley Beach residents can reasonably be expected, and what implications different levels of uptake have for the amount and type of development capacity required; and 7. Costs and benefits: whether the benefits of rezoning HPL actually outweigh the costs of its permanent loss, based on a transparent and independently reviewed economic assessment; and 8. Section 32: whether, having regard to those matters, a revised s32 assessment adequately addresses the uncertainty, risks of acting and not acting, and the costs and benefits of the proposed provisions.	
39	Debra Ducker	39.1	Oppose	Concerned about the erosion of rural character and the impact that adding 230 suburban lots will have on established rural neighbourhood.	That Plan Change 7 be declined in its entirety, and the land at 185 Ashworths Road retain its current Rural Zone classification.	Yes
		39.2		Concerned about hundreds of daily commuter cars on Hursley Terrace and Ashworths Roads creating severe safety risks and road damage on narrow roads used for heavy farm machinery.		
		39.3		Does not consider expecting beach residents to relocate their existing homes is a practical proposal due to most houses being unrecoverable or structurally unsuitable for moving. Considers forcing residents to bear the costs of demolition, disposal, and building new makes this plan unviable for assisting residents it is intended to assist, while permanently destroying productive rural land		
40	Matthew Dixon	40.1	Oppose	Concerned about the significant risk of excessive traffic volumes entering Hursley Terrace Road and the likelihood of serious accidents at the intersection of Hursley Terrace Road and SH1. Considers that the current rural road design and local corridor infrastructure are unsuited to handle the vehicle movements generated by high-density residential subdivisions and that increased traffic will severely degrade the local safety, noise levels, and rural amenity value of the road for existing residents.	Decline the plan change proposal unless comprehensive traffic calming infrastructure is mandated, or alternative primary access points are developed to prevent Hursley Terrace Road from being used as a high-volume thoroughfare	Yes
		40.2		Concerned about the environmental effects on rural character, residential amenity, and open-sky illumination from the introduction of a dense concentration of domestic outdoor lighting, security lights, and street lighting. Considers this increased light pollution will severely spill into the night sky, permanently ruining the submitter's long-term enjoyment of dark skies for astronomy and degrading the unique natural nightscape of the area.	Decline the plan change, or insert strict, legally enforceable lighting rules within the Outline Development Zone overlay. These rules must require all fixtures to be fully shielded (downward-facing only), utilize warm-spectrum LEDs(maximum 2700K), and enforce strict curfew hours for non-essential outdoor illumination to protect local dark sky activities.	
41	Shau Ducker	41.1	Oppose	Concerned about the impacts of additional daily commuter traffic on narrow rural roads creating major safety risks alongside tractors and farm machinery.	That Plan Change 7 be declined in its entirety, and the land at 185 Ashworths Road retain its current Rural Zone classification.	Yes
		41.2		Concerned that rezoning this large rural block sets a dangerous precedent that overrides the District Plan and destroys investment certainty for rural landowners.		
		41.3		Concerned that the proposal is based on an unrealistic relocation model as expecting beach residents to relocate homes is impractical as most are unrecoverable, leaving residents with		

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				huge demolition and new build costs that make this proposal unviable for those it aims to help.		
		41.4		Considers that extreme climate scenarios should not be used to override established property rights and existing rural character.		
		41.5		Considers that the Amberley Wastewater Treatment Plant is already failing to cope, with treated and partially treated wastewater leaching onto neighboring farmland and surrounding wetlands, during significant rain events. States that during normal conditions it is draining directly into the Mimimoto Lagoon as the discharge area can't cope with the amount the plant is discharging, with this being significantly more wastewater than consented. Concerned that adding 230 homes to an already overloaded treatment system will severely worsen coastal and environmental contamination.	Pause any future consideration of Plan Change 7 until an independent environmental investigation is conducted into the performance, consent compliance, and capacity of the Amberley Wastewater Treatment Plant regarding wastewater leaching onto local farmland, the Mimimoto Lagoon, and Amberley Beach.	
		41.6		Notes that the proposed subdivision is 4 to 5 kilometers from Amberley township along narrow rural roads and highways without footpaths, street lighting, or cycleways. Concerned that the Council has provided no clear proposal or costings for how residents and children will safely reach town, threatening to impose massive, unbudgeted infrastructure costs on local ratepayers.	Pause any future consideration of Plan Change 7 until full safety audits and cost estimates for required active transport infrastructure (footpaths/ cycleways to Amberley township) are published for ratepayer review.	
42	Alan James Hood	42.1	Oppose	Opposes purchase and rezoning of prime farm land to create a subdivision 7kms from Amberley and is concerned about the Council making the decision to change the zoning to allow the subdivision. Questions purchasers of land that is stated as needing to be cleared and rebuilt on another block of land, being included in any deal.	Stop this Amberley Beach shift of the Township and spend no more money on it at all. Leave decisions like this to central government.	No
43	<i>Withdrawn</i>					
44	Mitchell Cochrane	44.1	Oppose	Concerned about permanent loss of HPL, lack of consideration of alternates, and that that the benefits of this plan change do not outweigh the loss of productive land and the precedent it may set for further rural-to-residential rezoning around Amberley.	Decline Proposed Plan Change 7 – Rosewood Terrace. If the plan change is not declined, amend it to provide stronger protection for productive rural land, clearer limits on development, and binding requirements for transport and infrastructure upgrades to be completed and funded before development proceeds. Publicly notify any future resource consents sought for subdivision, earthworks, infrastructure upgrades, stormwater works, roading changes, beach access, or residential development associated with this project.	Yes
		44.2		Concerned about the impact of additional traffic on the surrounding local road network, including road safety, amenity, travel times for existing residents and road users and cumulative effects. Has particular concerns about the direct impacts of PC7 on Newcombes Road and its likely increased use for beach access resulting in conflicts, congestion and affecting the amenity and daily lives of residents along the road and restricting emergency access. Also concerned about the lack of adequate formal infrastructure to accommodate a significant increase in beach visitors. Consider that before the plan change is approved, Council should require a specific assessment of the effects of the proposed development on Newcombes Road, with any necessary upgrades to Newcombes Road being fully assessed, funded, and completed before development proceeds. Also concerned about cumulative effects of increased residential, recreational, visitor, construction, service and infrastructure traffic.		
		44.3		Concerned about whether existing and planned infrastructure can adequately support the proposed development, and considers the plan change should not transfer infrastructure costs, risks, or long-term maintenance burdens to the wider community.		
		44.4		Concerned that the plan change would alter the character of the area, may adversely affect the amenity, expectations, and ongoing use of neighbouring rural properties, and would erode the rural identity of Rosewood Terrace and the wider Amberley rural area.		

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		44.5		Concerned that residential development of this scale could increase hard surfaces and stormwater run-off, which may worsen existing drainage and flooding issues in the area.		
		44.6		Concerned that the proposed rezoning and development could result in the loss, fragmentation, or disturbance of habitat for native birds and lizard.		
		44.7		Concerned that the location is not suitable for a substantial increase in domestic cats and dogs associated with residential development, and the impact these domestic animals could have on nearby rural properties, stock, native birds, lizards, and other wildlife.		
		44.8		Concerned that Council's logic for enabling this rezoning as part of managed retreat for Amberley Beach residents appears to rely on a report that was not intended to be used in this context, and that the report may no longer be current or applicable.		
		44.9		Concerned about the impact and disruption that required infrastructure upgrades would have on current rural residents, including noise, dust, vibration, traffic disruption and reduced access.		
		44.10		Concerned about the potential effects of a substantial residential development on groundwater resources and existing water supplies in the surrounding rural area. Considers that before the plan change is approved, there should be a clear assessment of the existing groundwater environment, the proposed source of water supply for the development, the capacity and long-term sustainability of that supply, and any potential effects on existing residents who rely on local groundwater or private water supplies.		
		44.11		Concerned that individual effects may appear relatively minor when considered separately, but together could fundamentally change the character, safety and amenity of Newcombes Road and the surrounding rural area and that a specific assessment of the actual and cumulative effects of the development on Newcombes Road and the surrounding rural community should be undertaken. Considers that before the plan change is approved, any works, upgrades or mitigation measures required as a result of development should be clearly identified, fully funded and secured before development occurs.		
45	Pounamu Higgs	45.1	Oppose	Considers that the rezoning has not been sufficiently justified, given the loss of HPL, the scale of the proposed development, the financial implications of the Amberley Beach community and ratepayers, and the uncertainty regarding the coastal hazard assumptions on which the proactive relocation strategy is based.	Decline Plan Change 7 in its present form. If not declined, defer the decision until the following matters have been independently assessed and publicly reported: - An independent review of the coastal hazard modelling - An independent assessment of alternatives to rezoning highly productive land; - A full financial viability assessment; - An independent assessment of the financial risk to ratepayers; - A detailed assessment of the actual number of Amberley Beach residents seeking relocation; - A detailed assessment of the affordability of replacement housing;	Yes
		45.2		Notes the proposal creates additional residential development to assist with financing the relocation scheme, but questions whether PC7 is genuinely a coastal adaptation and relocation proposal, or whether coastal adaptation is being used as justification for creating a substantial new residential subdivision, and the precedent that this creates. Considers that the Council should demonstrate why the rezoning of land for 230 sections is necessary.		
		45.3		Opposes the conversion of productive rural land to urban development, and notes the requirements of the NPS-HPL in relation to rezoning for urban development. Outlines matters that should be demonstrated, with evidence, and considers that the decision should be based on the relevant statutory framework, not on the Council's purchase of the property.		
		45.4		Does not consider that historic consultation on the CAP/coastal hazards should automatically be treated as community support for the Rosewood Terrace proposal, noting that the CAP and PC7 relate to different decisions.		

Submission #	Submitter Name	Point #	Position	Submission Summary	Decision Sought	Heard?
		45.5		Concerned that a weakness in the relocation concept is the assumption that existing residents can move to a new site, but there can be substantial costs and practical difficulties with relocating houses, and the realistic alternative is demolition and construction of a replacement dwelling, which is a different proposition. Concerned about the financial consequences for existing Amberly Beach residents who cannot finance a new dwelling. Requests an assessment of the actual affordability of the proposed relocation model [submission includes matters the assessment should include].	- Full documentation regarding the coastal bund options and Environment Canterbury consenting position; - A comparison between continued coastal protection and proactive relocation; and - A transparent assessment of why approximately 230 sections are required when the identified existing community comprises approximately 109 properties.	
		45.6		Concerned about the reliance placed on high-end climate scenarios, the potential for them to be interpreted as predictions rather than risk scenarios, and their use to justify present-day expenditure and irreversible planning decisions.		
		45.7		Questions whether the proposal is consistent with the underlying adaptive philosophy of the CAP, and is concerned with residents and ratepayers being locked into one expensive pathway before the relevant triggers have been reached.		
		45.8		Considers that the existing coastal bund should not be prematurely discounted. Requests disclosure of hard protection options previously considered unacceptable or unavailable due to Environment Canterbury consenting requirements.		
		45.9		Considers that the Council's obtaining of a green social and sustainability loan should not determine the planning outcome. Outlines questions considered fundamental to whether the proposal is cost neutral to the wider community.		
		45.10		Concerned that the proposal development would transform a substantial rural property into an urban settlement, and that the visual and landscape effects should not be treated simply as a consequence of relocating an existing community.		
		45.11		Does not oppose planning for the long-term safety of Amberley Beach but does oppose treating one particular large-scale development solution as inevitable. [Submission outlines an approach considered to be more prudent.]		
46	Elizabeth Ann Goodwin	46.1	Support with amendments	Supports PC7 subject to the amendments and clarifications outlined in the submission. Considers that the proposal is a positive and necessary planning response to the long-term risks affecting the Amberley Beach settlement. Supports the principle of creating a planned, local residential option for Amberley Beach residents.	Retain the proposed rezoning of the relevant part of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone.	No
		46.2		Support is conditional on the relocation framework being made clearer, so that the plan change does not simply rezone land and leave the affected community uncertain about what happens next. Seeks amendments to the plan change, or formal Council commitments to ensure concerns relating to the process for relocation are addressed (including triggers, consultation, whether it is voluntary, preservation of the existing Amberley Beach community, priority for Amberley Beach residents, and implementation). Considers that without greater certainty about the process beyond the rezoning, the rezoning itself may create uncertainty.	Retain an Outline Development Plan framework for the Rosewood Terrace development.	
		46.3			Amend the plan change provisions, policies, rules, explanatory material, Outline Development Plan provisions, or associated implementation documents to make clear that the rezoning is an enabling measure and does not, of itself, require the relocation of Amberley Beach residents.	
		46.4			Include clear, objective and evidence-based triggers for any Council decision to initiate, recommend, facilitate, or materially advance the relocation of Amberley Beach residents.	
		46.5		Requests that the plan change should include or be supported by objective relocation triggers. [Submission includes matters that the triggers should cover]. Considers that it should be clear that the rezoning is an enabling measure and should not, by itself, mean that residents must relocate, or that relocation has already been determined.	Require that any relocation trigger is supported by current technical evidence, publicly available information, and direct consultation with affected Amberley Beach residents.	

Submission #	Submitter Name	Point #	Position	Submission Summary	Decision Sought	Heard?
		46.6		Seeks that the Council formally commit to taking all reasonable steps to keep Amberley Beach residents within the current Amberley Beach / Amberley community. [Submission includes matters the commitment should include].	Require Council to consult directly with Amberley Beach residents before any relocation pathway is activated.	
		46.7			Require Council to clearly state whether relocation is voluntary and, if not, to identify the legal basis, decision-making process and threshold for any non-voluntary relocation step.	
		46.8			Include a staged implementation framework that recognises that different parts of Amberley Beach may face different hazards, different timing issues, and different levels of risk.	
		46.9			Include a formal commitment that Council will take all reasonable steps to ensure that Amberley Beach residents are able to remain within the current Amberley Beach / Amberley community.	
		46.10			Provide existing Amberley Beach residents with priority access, or a clearly defined allocation pathway, within the Rosewood Terrace development if relocation becomes necessary or desirable.	
		46.11			Ensure that the design, staging and allocation of the Rosewood Terrace development supports community cohesion, neighbour relationships, accessibility and continuity of the existing Amberley Beach community.	
		46.12			Require transparent reporting to affected residents on infrastructure costs, servicing, rating impacts, development contributions, lot pricing, affordability measures and any resident contribution requirements.	
		46.13			Require any implementation or relocation framework to recognise the circumstances of older residents, vulnerable residents, residents on fixed incomes and residents who may face practical or financial barriers to relocation.	
		46.14			Require Council to adopt or public a relocation implementation framework before any relocation pathway is activated.	
		46.15			Make any further, alternative or consequential amendments necessary to give effect to this submission.	
47	Tony Lowsley	47.1	Oppose	Opposes the rezoning as the Council failed to consult residents before purchasing the land; the residents of Amberley Beach would be severely disadvantaged financially and would not be able to afford the cost of building a new home; and the land purchase has been rushed through before details of the land swap are known, or other alternatives having been pursued.	Do not rezone the land until the residents of the Amberley Beach have been made aware of all the details of the land swap deal so that we can make a fully informed decision.	Yes
48	Leslie Smart	48.1	Oppose	Opposes the plan change, considers it to be another example of reduction in productive farmland in NZ.	Deny HDC plan change 7.	Yes
		48.2		Concerned about the shifting of stormwater flooding onto Newcombes Rd area, the Kowai river mouth and surrounding area and the stormwater waste facilities the council maintains directly below the proposed subdivision.		

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				Considers that the development will impact the Amberley sewerage scheme and put more pressure on the Kowai River delta causing increased back flooding which is already problematic to the area.		
		48.3		Concerned that Proactive Relocation of the Amberley Beach community suggest forced relocation rather than a suggestion, and that it will set a precedent for Leithfield Beach.		
		48.4		Concerned that HDC has not considered alternatives, and notes that other councils are putting in interlocking erosion control structures that are robust, fit for purpose and fit with council core activity requirements. Considers that the interest alone (from debt funding the purchase of the site) would go a long way to putting in the erosion control structures.		
		48.5		Notes that people that purchased property at Amberley Beach did so because of its location.		
		48.6		Considers that there is a conflict between councils core activity and councils moving into the private sector, and that it is a divisive costly move at ratepayers expense, with no poll or referendum sought to ascertain if the community support the expenditure.		
		48.7		Considers this to be an ad hoc decision, especially relating to the district plan.		
49	Michael Goodwin	49.1	Support with amendments	Supports PC7 subject to the amendments and clarifications outlined in the submission. Considers that the proposal is a positive and necessary planning response to the long-term risks affecting the Amberley Beach settlement. Supports the principle of creating a planned, local residential option for Amberley Beach residents.	Retain the proposed rezoning of the relevant part of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone.	No
		49.2		Support is conditional on the relocation framework being made clearer, so that the plan change does not simply rezone land and leave the affected community uncertain about what happens next. Seeks amendments to the plan change, or formal Council commitments to ensure concerns relating to the process for relocation are addressed (including triggers, consultation, whether it is voluntary, preservation of the existing Amberley Beach community, priority for Amberley Beach residents, and implementation). Considers that without greater certainty about the process beyond the rezoning, the rezoning itself may create uncertainty.	Retain an Outline Development Plan framework for the Rosewood Terrace development.	
		49.3			Amend the plan change provisions, policies, rules, explanatory material, Outline Development Plan provisions, or associated implementation documents to make clear that the rezoning is an enabling measure and does not, of itself, require the relocation of Amberley Beach residents.	
		49.4			Include clear, objective and evidence-based triggers for any Council decision to initiate, recommend, facilitate, or materially advance the relocation of Amberley Beach residents.	
		49.5			Require that any relocation trigger is supported by current technical evidence, publicly available information, and direct consultation with affected Amberley Beach residents.	
		49.6			Require Council to consult directly with Amberley Beach residents before any relocation pathway is activated.	
		49.7			Require Council to clearly state whether relocation is voluntary and, if not, to identify the legal basis, decision-making process and threshold for any non-voluntary relocation step.	
		49.8			Include a staged implementation framework that recognises that different parts of Amberley Beach may face different hazards, different timing issues, and different levels of risk.	
		49.9			Include a formal commitment that Council will take all reasonable steps to ensure that Amberley Beach residents are	

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					able to remain within the current Amberley Beach / Amberley community.	
		49.10			Provide existing Amberley Beach residents with priority access, or a clearly defined allocation pathway, within the Rosewood Terrace development if relocation becomes necessary or desirable.	
		49.11			Ensure that the design, staging and allocation of the Rosewood Terrace development supports community cohesion, neighbour relationships, accessibility and continuity of the existing Amberley Beach community.	
		49.12			Require transparent reporting to affected residents on infrastructure costs, servicing, rating impacts, development contributions, lot pricing, affordability measures and any resident contribution requirements.	
		49.13			Require any implementation or relocation framework to recognise the circumstances of older residents, vulnerable residents, residents on fixed incomes and residents who may face practical or financial barriers to relocation.	
		49.14			Require Council to adopt or public a relocation implementation framework before any relocation pathway is activated.	
		49.15			Make any further, alternative or consequential amendments necessary to give effect to this submission.	
50	Brittany Aitken	50.1	Oppose	Opposes the Plan Change and does not believe this plan is in the best interest for Amberley Beach residents and does not consider that it is “cost neutral”. Concerned that the CAP has already had adverse effects on landowners, as potential buyers have been put off buying at Amberley Beach because of the uncertainty of what’s happening here. States that none of the triggers have happened to encourage the council to move so quickly on relocation, and is concerned about the rushed nature of this proposal and the millions of dollars spent on land. Questions the council intentions in light of this, and the dismissive attitude towards residents and members of the public at some of the community meetings.	[Decline the plan change.]	Yes
51	Elizabeth Kelsey	51.1	Oppose	Opposes the plan change as considers that there is no/insufficient evidence that the change would achieve its stated purpose, including: - the financial viability of the relocation for Amberley Beach residents; - the social impact of the proposed plan change on Amberley Beach residents; - the effect of the proposed plan change on the services delivered to Amberley Beach; - the effect of the proposed plan change on work to the Amberley Beach bund/other sea protection efforts; - the effect of the timing of the proposed plan change on the matters above; - the suitability of the proposed relocation site in respect of stormwater effects and sewerage/wastewater treatment facilities; - the actual cost on of the proposal on the wider community; and - the loss of amenity for non-beach residents.	Reject the proposed plan change.	Yes

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				Considers that the proposal is inconsistent with the CAP, on which Amberley Beach residents were consulted. Notes that the MR&LB Proposal, on which the Council relies, is a 'proposal' only, and has never been consulted upon, approved or otherwise agreed by Amberley Beach residents.		
52	Arthur Light	52.1	Oppose	Concerned that the rezoning is for more lots than needed to relocate those properties at Amberley Beach who opt to relocate. Considers that the huge size of the subdivision is to save HDC money, not to achieve the relocation and that this is outside the scope of criteria for a Plan Change.	Decline PC7 Sell Rosewood Farm and cease the current unnecessary managed relocation initiatives.	Yes
		52.2		Considers the location at Rosewood Farm to be inappropriate for residential development as it is productive farmland and part of the rural ambience and landscape which South Islanders value and will create unsightly ribbon development, increase traffic congestion and wreck the charm of the North Canterbury open space region.		
		52.3		Concerned that the Council has been less than open and consultative with Amberley Beach owners about this managed relocation.		
		52.4		Concerned that the Council has proceeded despite the NZ Government advising caution against actions based on extreme and high end climate change involving Council planning, infrastructure and costs.		
		52.5		Considers that there is no robust financial analysis on the financial impact on ratepayers of PC7 – as the EIA itself states it is not a financial viability model.		
		52.6		Endorses and adopts the submissions of Amberley Beach Guardians Inc.		
53	Amberley Beach Ratepayers and Residents Association	53.1	Oppose	Considers that the central issue for the plan change is whether the Council has established a sufficiently robust basis for the permanent conversion of approximately 34 hectares of HPL for residential use. In relation to the NPS-HPL: - Notes that the additional market lots are proposed to make the relocation scheme financially neutral, and that this is not the question under the NPS-HPL, which is instead about whether they are required to provide sufficient development capacity to meet expected demand. - Considers that the evidence establishes uncertainty about whether and when the relocation will occur, which is relevant to the NPS-HPL requirement to establish expected demand. - Considers that the EIA demonstrates what scale of development may be required, under a particular financial model and set of assumptions, but considers this different from establishing the same development is required under cl 3.6(4)(a). - Considers that there is a discrepancy in the amount of land required, and the amount of land proposed to be rezoned, in terms of whether it is the minimum necessary. - Considers that the CAP does not, by itself, establish the necessity of PC7. - Considers that a community preference for future relocation to remain close to Amberley Beach does not establish that residents will actually participate in the proposed land-swap arrangement. - Considers that alternatives assessment should start from establishing what development capacity is required, and what is the least-HPL way of providing it.	Decline PC7 in its current form. Alternatively, before any rezoning of HPL is approved: - Establish the actual level of demand and likely participation by Amberley Beach property owners; - Separately justify the 109 relocation lots and additional market lots against clause 3.6(4)(a) of the NPS-HPL; - Provide a robust and independent financial viability assessment rather than relying solely on the current EIA financial modelling; - Clearly identify why approximately 34 hectares is the minimum land area necessary under clause 3.6(5); - Undertake a comprehensive assessment of reasonably practicable and feasible alternatives, including alternatives to the proposed scale and structure of the relocation model; and - Address the uncertainties identified above through a robust s32 assessment.	Yes

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		53.2		Considers that the uncertainty associated with the proposed relocation must be properly recognised and addressed in deciding whether the rezoning of HPL is justified now.		
		53.3		Considers that the claimed economic benefits must be separated from the costs of the preferred model.		
54	North Canterbury Province, Federated Farmers of New Zealand	54.1	Oppose	Considers that PC7 is inconsistent with the requirements in the District Plan relating to highly productive soils (Issue 3, Objective 3.2 and Policy 3.2); and with clauses 3.6(4) and 3.6(5) of the NPS-HPL. The submitter considers that the demand for the new subdivision is lacking, that the benefits of the rezoning do not outweigh the costs associated with the loss of HPL for land-based primary production and that the rezoning of a greater area than needed to rehome Amberley Beach residents to achieve cost neutrality is not a reason allowed by the NPS-HPL.	Do not proceed with Plan Change 7. If the plan change does proceed: - Strictly adhere to cost neutrality, and that costs do not fall upon the wider community, especially rural rate payers; - Plan for, and avoid or mitigate reverse sensitivity issues to the greatest extent possible, and do not place additional constraints on surrounding land-users; - Plan for and manage additional road traffic without disrupting or preventing the routine activities of the surrounding rural community (e.g. stock crossing roads).	Yes
		54.2		Appreciates intent to make the project cost neutral for the wider community, and requests that if PC7 goes ahead, this principle is adhered to for all aspects of the development.		
		54.3		Considers that as the proposed new subdivision is completely surrounded by rural land, it is almost inevitable that reverse sensitivity issues will occur. Requests that if the subdivision goes ahead, every effort is made to avoid reverse sensitivity issues, including design measures such as appropriate layout, buffer zones and strategic planting.		
		54.4		Considers that the additional traffic will put considerable additional pressure on the local roading network and that if the new subdivision proceeds, roading issues should be carefully planned for and funded so upgrading costs for not fall on the wider community.		
55	Graeme & Sally Sutherland	55.1	Oppose	Concerned that the rezoning will permanently change the character and landscape of the area and that it is not the right long-term solution for Amberley Beach.	Decline the proposed rezoning of 185 Ashworths Road from Rural Zone to Residential 1 Zone.	Yes
		55.2		Considers that full infrastructure aspects have not been taken into overall consideration and fully investigated as to what ratepayer costs are going to be incurred for the whole district.		
		55.3		Understands that there are coastal issues affecting Amberley Beach but does not consider that they automatically justify rezoning a large area of rural land and that alternative options that would allow the community to stay where it is have not been sufficiently considered.		
		55.4		Concerned about what PC7 actually enables and that it is out of sequence with the implementation pathway in the CAP and MR&LB Proposal as no triggers have been met.		
		55.5		Considers that the CAP is no longer fit-for-purpose, community and circumstances have changed, and that a new plan should be investigated and peer reviewed and consulted on.		
56	James Clark Silcock	56.1	Support with amendments	Supports PC7 subject to the amendments and clarifications outlined in the submission. Considers that the proposal is a positive and necessary planning response to the long-term risks affecting the Amberley Beach settlement. Supports the principle of creating a planned, local residential option for Amberley Beach residents.	Retain the proposed rezoning of the relevant part of 185 Ashworths Road, Amberley from Rural Zone to Residential 1 Zone.	No
		56.2		Support is conditional on the relocation framework being made clearer, so that the plan change does not simply rezone land and leave the affected community uncertain about what happens next. Seeks amendments to the plan change, or formal Council commitments to ensure concerns relating to the process for relocation are addressed (including triggers, consultation, whether it is voluntary, preservation of the existing Amberley Beach community,	Retain an Outline Development Plan framework for the Rosewood Terrace development.	
		56.3			Amend the plan change provisions, policies, rules, explanatory material, Outline Development Plan provisions, or associated implementation documents to make clear that the rezoning is an enabling measure and does not, of itself, require the relocation of Amberley Beach residents.	

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		56.4		priority for Amberley Beach residents, and implementation). Considers that without greater certainty about the process beyond the rezoning, the rezoning itself may create uncertainty. Requests that the plan change should include or be supported by objective relocation triggers. [Submission includes matters that the triggers should cover]. Considers that it should be clear that the rezoning is an enabling measure and should not, by itself, mean that residents must relocate, or that relocation has already been determined. Seeks that the Council formally commit to taking all reasonable steps to keep Amberley Beach residents within the current Amberley Beach / Amberley community. [Submission includes matters the commitment should include].	Include clear, objective and evidence-based triggers for any Council decision to initiate, recommend, facilitate, or materially advance the relocation of Amberley Beach residents.	
		56.5			Require that any relocation trigger is supported by current technical evidence, publicly available information, and direct consultation with affected Amberley Beach residents.	
		56.6			Require Council to consult directly with Amberley Beach residents before any relocation pathway is activated.	
		56.7			Require Council to clearly state whether relocation is voluntary and, if not, to identify the legal basis, decision-making process and threshold for any non-voluntary relocation step.	
		56.8			Include a staged implementation framework that recognises that different parts of Amberley Beach may face different hazards, different timing issues, and different levels of risk.	
		56.9			Include a formal commitment that Council will take all reasonable steps to ensure that Amberley Beach residents are able to remain within the current Amberley Beach / Amberley community.	
		56.10			Provide existing Amberley Beach residents with priority access, or a clearly defined allocation pathway, within the Rosewood Terrace development if relocation becomes necessary or desirable.	
		56.11			Ensure that the design, staging and allocation of the Rosewood Terrace development supports community cohesion, neighbour relationships, accessibility and continuity of the existing Amberley Beach community.	
		56.12			Require transparent reporting to affected residents on infrastructure costs, servicing, rating impacts, development contributions, lot pricing, affordability measures and any resident contribution requirements.	
		56.13			Require any implementation or relocation framework to recognise the circumstances of older residents, vulnerable residents, residents on fixed incomes and residents who may face practical or financial barriers to relocation.	
		56.14			Require Council to adopt or public a relocation implementation framework before any relocation pathway is activated.	
		56.15			Make any further, alternative or consequential amendments necessary to give effect to this submission.	
57	Stewart & Kate Henry	57.1	Oppose	Considers that the motivation for PC7, being the threat to Amberley Beach from extreme climate change caused by carbon dioxide, has been proven to be nonsense, and that HDC has not obtained authoritative evidence regarding hazard risk, as it has relied solely on a report by Jacobs, who has been widely discredited in the area of coastal planning and risk analysis. Considers that coastal disasters in New Zealand over recent years, initially been attributed to	Sell Rosewood Farm as is, or divide it into four hectare lots for individual sale.	Yes

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				climate change have all been shown to be the result of neglect and incompetence, mainly by local councils. Considers that there has been poor maintenance of the bund between the beach and settlement		
		57.2		Considers that Rosewood Farm is productive agricultural land with good soils and should remain so, not become another urban settlement on rural land between Amberley and Leithfield.		
		57.3		Concerned that the proposed development would in effect create a substantial new settlement that would not be part of Amberley, Amberley Beach or Leithfield, with no facilities of its own, requiring residents to drive everywhere and result in additional car journeys. Considers that future growth should be encouraged in and around Amberley, where there are existing facilities and where any extra commercial facilities would be appropriate, and with encouragement for walking and cycling.		
		57.4		Concerned that the new settlement would cause SH1 between Leithfield and Amberley to become more dangerous, with many more serious accidents.		
		57.5		Considers borrowing for the purchase of Rosewood Farm to be huge and irresponsible in the current economic circumstances, and is concerned about ratepayers covering future losses.		
		57.6		Considers that the Council should leave subdivision to private developers who are better suited to take such risks and should focus on core job of providing normal infrastructure to ratepayers.		
		57.7		Concerned about the voluntary approach becoming compulsory, and the costs associated with home demolition and removal resulting from pressure on property owners that relies on coastal reports written by discredited authors.		
58	Lois Florence Newick	58.1	Oppose	Concerned about the lack of engagement with the beach community and considers there is a need for more meaningful engagement to make decision together with the Council.	Rethink the whole proposal and the process.	Yes
		58.2		Concerned about the potential loss of a small close community, and the unknown timing of if or when it may or may not happen. Notes that the support for the CAP was based on nothing occurring until 1 of the triggers was reached, with a conservation then occurring between the Council and community about what happens next.		
		58.3		Supports focusing on the first line of defence from the sea.		
59	Megan & Davis Latham	59.1	Oppose	Considers that the plan change is premature, insufficiently certain, and does not provide adequate protection for a small and vulnerable coastal community that may be materially affected by the proposal.	Decline Plan Change 7 as currently notified. Alternatively, defer approval until Council has prepared and consulted on a full relocation implementation framework for Amberley Beach residents. Require Council to: - Clearly state whether the relocation is voluntary or compulsory. - Identify the legal basis, process and threshold for any non-voluntary relocation step, if any such step is contemplated.	No
		59.2		Concerned that the plan change does not adequately address human and community impacts and risks reducing the issue to a technical rezoning exercise.		
		59.3		Concerned that the proposal lacks clear, objective and enforceable relocation triggers; and does not sufficiently explain whether relocation would be voluntary, encouraged incentivised, expected or required.		
		59.4		Concerned that there is a lack of clear information about costs and financial consequences for affected residents, and whether the financial model is fair, transparent and realistic for affected residents. Considers that any relocation proposal must expressly consider vulnerable residents and that the plan change should not be appropriate without safeguards to ensure		

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				these members of the Amberley Beach community are not left worse off, priced out, or forced into uncertainty.	- Publish a full cost framework before the plan change is approved or implemented. - Identify who will pay for infrastructure, servicing, development contributions, moving costs, legal costs, connection costs, rating impacts and any other financial consequences. - Explain how the proposal will be “cost neutral to the wider community” without unfairly transferring costs to Amberley Beach residents. - Identify what will happen to existing Amberley Beach properties if relocation occurs. - Identify how uncertainty for current residents will be avoided or mitigated. Require clear, objective and evidence-based relocation triggers before any relocation process can be initiated, recommended, facilitated, or materially advanced. Require that any relocation trigger be based on current independent technical evidence and publicly available reporting. Require direct consultation with affected Amberley Beach residents before any relocation pathway is activated. Require an affordability framework for affected residents, including older residents, vulnerable residents and residents on fixed incomes. Require priority access or a protected allocation pathway for existing Amberley Beach residents if the Rosewood Terrace land is to be relied on for relocation. Prevent the Rosewood Terrace development from proceeding as a general market subdivision unless and until the needs of Amberley Beach residents have been properly addressed. Require staging provisions that allow Amberley Beach residents to relocate together, or substantially together, where they wish to do so. Require binding or formally adopted provisions to protect the continuity of the existing Amberley Beach community. Require further consultation with Amberley Beach residents on the Outline Development Plan, lot allocation, staging, affordability, infrastructure, reserves, access and community facilities. Require any amended plan change to expressly state that rezoning does not, of itself, mean that relocation has been determined, required or triggered.	
		59.5		Considers that the plan change does sufficiently guarantee that Amberley Beach residents will be able to relocate together, or substantially together if relocation occurs, and that existing residents may be priced out or dispersed if there is no priority, staging or allocation protection for them.		
		59.6		Concerned that approving the plan change makes an assumption that relocation is the preferred or inevitable outcome regardless of triggers being met, and that it will create unintended consequences with how Beach properties are viewed, discouraging investment in maintenance and improvements.		
		59.7		Considers that the plan change should not be approved ahead of a clear implementation framework.		
		59.8		Considers that the Council should be satisfied that the scale, staging, layout, servicing and allocation of the development genuinely align with the stated relocation purposes, as it this is not secured, there is a risk the rezoning becomes general residential growth using relocation as a justification.		

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					Make any further, alternative or consequential amendments necessary to address the concerns raised in this submission.	
60	Timothy John Goulding	60.1	Oppose	Considers that PC7 does not follow the DAPP approach set out in the CAP and in the PMRLB, as the plan change is to only take place after triggers are met under the CAP, and that PC7 is therefore premature by many years and may never be needed. Considers that by proceeding before trigger point based thresholds under the CAP are reached, PC7 surreptitiously predetermines pathways under CAP, thereby undermining its dynamic pathways approach.	That PC7 be declined. Proper maintenance and enhancement and extension of the Amberley Beach bund be committed to by HDC. That rock revetment be approved for Amberley Beach as it was for Gore Bay as the preferred risk management tool rather than managed relocation. That other risk mitigation initiatives be undertaken eg opening the direct Waipara River outlet to the ocean and controlling shingle removal from Waipara River. That a review in conjunction with the Amberley Beach community be undertaken of the CAP especially its trigger points.	Yes
		60.2		Concerned that the Council has not accessed current data and science and evidence to support PC7, including that it has not critically reviewed and assessed the now dated and non-peer-reviewed Jacobs Report, and has ignored or discounted a Ministerial directive in regard to non-reliance on extreme projections as adopted in the Jacobs Report. Considers that fluvial and pluvial risks have been effectively mitigated by Stanton Rd stormwater diversion and periodic Mimimoto Lagoon opening thereby significantly reducing hazard risk at Amberley Beach which has not been factored into the risk equation underpinning PC7.		
		60.3		Considers that PC7 takes a nuanced and inconsistent approach by HDC to hazard management across its jurisdiction with markedly different solutions proposed for other coastal communities.		
		60.4		Considers that PC7 does not factor in the resilience of the Beach environment and the Beach community to meeting natural hazards.		
		60.5		Concerned that PC7 will cause immediate and direct loss to Beach properties by steering the settlement into a retreat pathway, resulting in the elimination of other relief such as better mitigation of hazards and compensation and insurance options, which are considered to be far more cost effective for owners than managed relocation and obviate the need for PC7. Considers that the substantial financial loss to Amberley Beach property owners is downplayed in s32 Report and EIA.		
		60.6		Concerned that the s32 Report and EIA incorrectly state the financial costs to date incurred by HDC in protection measures at Amberley Beach, as they don't acknowledge that Beach ratepayers fund the bund by levy.		
		60.7		Considers that the key requirements set out in the s32 Report and the EIA make critical incorrect assumptions and that the 'key requirements' have been contrived by HDC to justify PC7.		
		60.8		Considers that HDC has undertaken inadequate preliminary research to ascertain likely uptake by Amberley Beach owners, and that there is only a remote potential uptake from these owners, making the prime reason for plan change remote or unlikely.		
		60.9		Considers that HDC should not be engaging in speculative development which PC7 enables as this is outside its core role as a Council.		
		60.10		Considers that PC7 will create another urban enclave in the countryside adjoining State Highway 1, which is undesirable from a planning point of view especially when it is between two towns which are only 5km apart, and will create something akin to 'ribbon development'.		
		60.11		Concerned that there has been poor and inadequate consultation with Amberley Beach Owners and the community.		

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		60.12		Concerned that the detail of the managed relocation section uptake and consequences have not been worked through and considers that this should have been a condition precedent of PC7.		
		60.13		Concerned that the scale of development facilitated by PC7 overrides the dominant purpose of the Plan Change to provide relocation sections.		
		60.14		Considers that PC7 is not driven by the need for managed relocation or the need for a large subdivision at Rosewood location, but by HDC's agenda, loan access, desire for more housing, and desire to set a climate change precedent.		
61	Andy Mason and Angie Mason of behalf of the Amberley Trust	61.1	Oppose in part	Concerned about the adequacy of the transport assessment in relation to: - the precise access location now shown on the ODP, which differs from the location assessed in the ITA; - a workable intersection concept and sufficient ODP land envelope for turning lanes, stacking, tapers, visibility splays, earthworks, drainage and any other associated works; - how the existing Amberley House driveway is to be retained, relocated, integrated or otherwise managed, including its existing and occasional higher traffic volumes; - how the nine-lot Gracebrook Subdivision access, now directly opposite the ODP access location, is to operate safely as part of the intersection arrangement; - the Safe Intersection Sight Distance and other sight-distance requirements at the relocated access position, having regard to actual operating speeds; - the requirement for NZTA approval of the location and detailed design on a limited access State Highway; - wider strategic transport, public transport, walking, cycling and active transport connectivity in the locality; - future north-south and east-west road, active transport, open space and infrastructure linkages; - whether the ODP may sterilise future transport and infrastructure connections between SH1, Amberley Beach Road, Hursley Terrace, adjoining landholdings and future growth areas; - whether it is appropriate to treat the proposal solely as a village relocation when only 109 of the proposed 238 properties are dedicated to relocation and the majority are additional residential growth; - whether the transport assessment assumption that 109 existing Amberley Beach households will relocate is secured by any enforceable plan rule, staging control, certification process or enduring legal instrument, or whether the existing and new settlements could operate concurrently.	Decline PC7 in its current form, unless and until the ODP, Section 32 assessment, Integrated Transport Assessment, Landscape Assessment, Mitigation Planting Guidelines and associated provisions are amended to properly assess and address the matters raised in the submission. Require an updated Integrated Transport Assessment assessing the precise SH1 access location shown on the ODP, rather than the earlier Option E location. Require an updated concept intersection design that incorporates the proposed Rosewood Terrace road, the existing Amberley House driveway and the nine-home Gracebrook Subdivision access. Require the updated assessment and design to address existing and proposed traffic, turning movements, separated turn lanes, stacking, tapers, masking, operating speeds, Safe Intersection Sight Distance, visibility splays, earthworks, drainage and access rights. Require the ODP to identify and protect a sufficient land envelope for the full intersection and associated works, without assuming that adjoining private land will be available. Require the ODP to identify how the Amberley House and Gracebrook accesses will be retained, relocated, integrated, staggered or otherwise managed. Amend the ODP so that the State Highway access location and corridor are not fixed unless they have been assessed at that precise location and accepted in principle by NZTA.	Yes
		61.2		Concerned about the effects on Amberley House as a heritage homestead and working rural property; and reverse sensitivity and operational effects arising from public open space and mitigation planting areas adjoining active farm boundaries.	Require the Section 32 evaluation and any updated Integrated Transport Assessment to expressly address the assumptions, qualifications and unresolved matters recorded in Attachments C1-C3, and not treat the LGOIMA-released correspondence as final NZTA approval of the notified ODP access location or detailed intersection design. Require the Section 32 evaluation to be updated to address the relocated access, the existing accesses, the sufficiency of the	

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					intersection land corridor, the NZTA approval pathway and the risks of fixing an unapproved design through the ODP. Require the Integrated Transport Assessment to be updated to assess the cumulative scenario in which the existing Amberley Beach settlement remains occupied and all Rosewood Terrace lots are developed as independent new residential lots, unless enforceable one-for-one relocation controls are incorporated into PC7. Require a binding staging standard under which the number of occupied Rosewood Terrace lots counted as relocation lots cannot exceed the number of corresponding existing Amberley Beach properties certified by Council as having permanently ceased residential use. Require an approved Relocation Implementation and Monitoring Plan identifying matched old and new properties, the method by which residential use at each corresponding old property will permanently cease, any temporary overlap, certification, record-keeping, reporting and enforcement, supported by covenants, consent notices or other registered instruments as legally appropriate. Require any temporary overlap between occupation of a new relocation lot and continued residential use of its corresponding Amberley Beach property to be time-limited, specifically assessed in the updated Integrated Transport Assessment, and subject to completion of any additional transport mitigation or upgrades required by Council and NZTA. Require a locality-wide structure planning and connectivity appraisal before the ODP is confirmed, recognising that only 109 of the proposed 238 properties are dedicated to relocation and that the majority represent additional residential growth. Require the ODP to identify and safeguard potential future road, public transport, walking, cycling, open space and infrastructure corridors connecting SH1, Rosewood Terrace, adjoining landholdings, Hursley Terrace and Amberley Beach Road. Require further assessment of whether the proposed access and development-edge configuration may sterilise future strategic transport or infrastructure connections. Amend the ODP so that open space and landscape buffers do not operate as barriers to future integration, but form part of a connected wider structure plan capable of supporting future growth east of SH1. Require the ODP, Landscape Assessment and Mitigation Planting Guidelines to assess and address the effects of public	

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					open space and mitigation planting areas on adjoining active farming operations. Require restrictions on public access within open space and mitigation planting areas immediately adjacent to active farm boundaries unless adequate dog-proof and stock-proof fencing and management controls are in place. Require Council or the subdivider, at its cost, to upgrade boundary fencing between any Council-owned or publicly accessible open space and adjoining active farmland to a stock-proof and dog-proof standard before public access is enabled. Require a reserve/open space management plan addressing public access, dog control, signage, fencing, gate management, maintenance, rubbish, biosecurity and complaints processes. Add the following wording to proposed Policy 4.32: <i>The protection and integration of existing lawful access arrangements to State Highway 1, including the Amberley House driveway and the Gracebrook Subdivision access, unless an alternative arrangement is agreed with the affected landowner and NZTA and is demonstrated to maintain or improve safety, functionality and legal access.</i> <i>The identification and protection of a sufficient land envelope for the State Highway intersection and all associated turn lanes, stacking, tapers, visibility splays, Safe Intersection Sight Distance, drainage, earthworks and access integration, based on an updated assessment of the precise ODP location and a concept accepted in principle by NZTA.</i> <i>The identification and safeguarding of potential future road, public transport, walking, cycling, open space and strategic infrastructure connections to adjoining landholdings, Hursley Terrace, Amberley Beach Road and State Highway 1, so that future network resilience, servicing and community connectivity options are not unnecessarily foreclosed.</i> <i>Recognition that the Rosewood Terrace Management Area provides for approximately 238 residential properties, of which only 109 are dedicated to relocation, and must therefore be planned and assessed as a substantial new residential growth area as well as a relocation response.</i> <i>Ensuring that transport effects are assessed on the basis of the actual development outcome. Where 109 lots are treated as relocated households rather than additional residential growth, subdivision and occupation must be</i>	

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					<i>staged and legally secured so that corresponding existing Amberley Beach properties permanently cease residential use. If that outcome cannot be secured, the cumulative operation of the existing and new settlements must be assessed and provided for.</i> <i>The design and management of open space, mitigation planting and development edges so as to avoid reverse sensitivity effects on adjoining rural production activities, including effects associated with public access, dogs, livestock disturbance, rural noise, odour, dust, spraying, stock movements and seasonal farming activities.</i> Add the following matters of control to Rule 5.6.11.2: <i>The extent to which the subdivision layout and roading network integrates with existing lawful accesses, including the Amberley House driveway and Gracebrook Subdivision access, and avoids adverse effects on their safety, functionality, access rights and legal certainty.</i> <i>The extent to which the State Highway intersection location, geometry and land corridor have been assessed at the precise ODP location and accepted in principle by NZTA, including provision for separated turn lanes, stacking, tapers, actual operating speeds, Safe Intersection Sight Distance, visibility splays, drainage and earthworks.</i> <i>The extent to which any reliance on the relocation of 109 Amberley Beach households is secured by enforceable one-for-one staging, Council certification and enduring legal controls, rather than relying only on an intention or expectation that relocation will occur.</i> <i>The traffic effects of any period in which the existing and new settlements operate concurrently, including the maximum number and duration of overlapping occupied properties, the trip-generation and route-distribution assumptions used, and the need for additional intersection or network mitigation.</i> <i>The extent to which the subdivision layout safeguards future road, public transport, walking, cycling, open space and infrastructure connections to adjoining land and the wider transport network, including potential connections between State Highway 1, Amberley Beach Road and Hursley Terrace.</i> <i>The extent to which open space, landscape treatment and mitigation planting areas support, rather than prevent, future integration with adjoining land, including future road</i>	

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					<i>reserves, active transport links, utility corridors and servicing connections.</i> <i>The extent to which public open space and mitigation planting areas adjoining active rural land are designed, fenced and managed to avoid adverse effects on livestock, animal welfare, rural production activities and existing farming operations.</i> <i>The provision of stock-proof and dog-proof boundary fencing, gates, signage and ongoing maintenance arrangements, and the location and management of public access routes, walking and cycling routes and recreation areas so as to avoid uncontrolled access, dogs off leash, stock disturbance and conflict with adjoining rural production activities.</i> Add a specific relocation and staging standard to Rule 5.6.11 or the ODP provisions along the following lines: <i>Relocation and staging standard</i> <i>(a) No lot within Rosewood Terrace that is counted as one of the 109 relocated households for transport assessment purposes may be occupied unless Council has certified that a corresponding existing Amberley Beach property has permanently ceased residential use.</i> <i>(b) Certification must be supported by an approved Relocation Implementation and Monitoring Plan and by a covenant, consent notice or other enduring legal instrument, as legally appropriate, that prevents the corresponding old property being returned to residential use unless the cumulative transport effects have first been reassessed and approved.</i> <i>(c) Any temporary overlap required to facilitate physical relocation must be expressly authorised, limited in duration and number, recorded in the relocation register, and assessed in the updated Integrated Transport Assessment.</i> <i>(d) If the one-for-one relocation outcome cannot be legally secured, subdivision and occupation must be assessed on the basis that the existing Amberley Beach settlement remains and all Rosewood Terrace lots are additional residential development, with any transport upgrades required by that cumulative assessment completed before the relevant stage proceeds.</i> <i>(e) Failure to comply with this standard should make the relevant subdivision or residential land use a noncomplying activity, so that the relocation assumption cannot be</i>	

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					<i>deferred or waived without a fresh assessment of the cumulative transport effects.</i> Add the following wording to the Mitigation Planting Guidelines or ODP notes: <i>Where mitigation planting or open space areas adjoin active rural land, public access must be restricted unless and until the boundary has been fenced to a stock-proof and dog-proof standard approved by Council in consultation with the adjoining landowner. The fencing must be installed at the cost of the subdivider or Council before public access is enabled and must be maintained by the owner or manager of the open space area.</i> <i>Public access routes through open space and mitigation planting areas must be designed to avoid active farm boundaries wherever practicable. Dogs must be prohibited or required to be on leash in all open space areas adjoining active farm land, with signage and management controls to be included in an approved reserve/ open space management plan.</i> <i>The approved reserve/open space management plan must identify how adjoining rural production activities will be protected, including management of dogs, public access, fencing, gates, signage, biosecurity, rubbish, complaints, maintenance responsibilities and seasonal livestock sensitivity.</i> Require further consultation with and an agreement in principle from directly affected access owners, including Amberley House and Gracebrook, before the ODP access location and design corridor are confirmed. Require evidence of NZTA approval in principle for the intersection location and concept before subdivision reliant on that access is granted. Require the ODP and associated assessments to expressly recognise the heritage, garden, farming, equestrian, staffing, contractor and event functions of Amberley House and ensure that PC7 does not create reverse sensitivity, access, traffic, public safety or operational constraints on those established Activities.	
62	Christine Clyne	62.1	Oppose	Concerned that the relocation proposal is based on projections based on the worst case emissions scenario known as RCP8.5 which the IPCC has now admitted are implausible and has been scrapped.	Reject the planned relocation of the resident of Amberley Beach	Not stated
		62.2		Concerned that previous offers to construct a wall to keep back the ocean were rejected.		

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		62.3		Concerned that no compensation has been offered for the resident's dwellings, with reliance placed on residents purchasing a block of land and then having to build another house.		
63	Celine Goulding	63.1	Oppose	Considers that the central issue for the plan change is whether the Council has established a sufficiently robust basis for the permanent conversion of approximately 34 hectares of HPL for residential use. In relation to the NPS-HPL: - Notes that the additional market lots are proposed to make the relocation scheme financially neutral, and that this is not the question under the NPS-HPL, which is instead about whether they are required to provide sufficient development capacity to meet expected demand. - Considers that the evidence establishes uncertainty about whether and when the relocation will occur, which is relevant to the NPS-HPL requirement to establish expected demand. - Considers that the EIA demonstrates what scale of development may be required, under a particular financial model and set of assumptions, but considers this different from establishing the same development is required under cl 3.6(4)(a). - Considers that there is a discrepancy in the amount of land required, and the amount of land proposed to be rezoned, in terms of whether it is the minimum necessary. - Considers that the CAP does not, by itself, establish the necessity of PC7. - Considers that a community preference for future relocation to remain close to Amberley Beach does not establish that residents will actually participate in the proposed land-swap arrangement. - Considers that alternatives assessment should start from establishing what development capacity is required, and what is the least-HPL way of providing it.	Decline PC7 in its current form. Alternatively, before any rezoning of HPL is approved: - Establish the actual level of demand and likely participation by Amberley Beach property owners; - Separately justify the 109 relocation lots and additional market lots against clause 3.6(4)(a) of the NPS-HPL; - Provide a robust and independent financial viability assessment rather than relying solely on the current EIA financial modelling; - Clearly identify why approximately 34 hectares is the minimum land area necessary under clause 3.6(5); - Undertake a comprehensive assessment of reasonably practicable and feasible alternatives, including alternatives to the proposed scale and structure of the relocation model; and - Address the uncertainties identified above through a robust s32 assessment.	Yes
		53.2		Considers that the uncertainty associated with the proposed relocation must be properly recognised and addressed in deciding whether the rezoning of HPL is justified now.		
		53.3		Considers that the claimed economic benefits must be separated from the costs of the preferred model.		
64	Roberts Household	64.1	Support	Questions how PC7 will benefit the whole ratepayers and what the District will achieve from it. Is unsure whether Beach residents will want to move and what the cost will be for a section. Considers it unfair if [Beach residents] do a direct swap of beach land for a new section, giving them the benefits and not the wider community.	Unclear.	Yes
		64.2		Questions whether there will be a driveway land out onto State Highway 1 or whether it will come off Hursley Terrace Road, and whether the roads will need to be upgraded for this.	Unclear.	
65	Simon & Jaimee Thorne	65.1	Support	Support the rezoning but seeks provision of a future roading link between new roading link to State Highway 1 and 113, 431 & 432 Ashworths Road to futureproof the southern part of Amberley, if rezoning ever occurs between the plan change site and Amberley Township, allowing for a direct connection to Amberley Township without the need to travel using State Highway 1.	[Amend the Outline Development Plan to provide a future roading link as shown in the submission.] Fully consider the long-term strategic transport needs of the area before making a decision and do not prevent or compromise the opportunity to establish a future road link from the [plan change site] through the submitter's land to Amberley.	Yes
66	Bernadette Mary Hall	66.1	Oppose	Concerned about the speed the process is now moving at.		No

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		66.2		Concerned about the lack of transparency regarding the land purchase.	Slow down the process of moving the beach community, and undertake it as a careful, well-thought through and documented project. Choose a more suitable location. Provide written details of service expenses, building regulations and land preparation to all beach households, Accurately record and publish triggers.	
		66.3		Concerned about the extra rates paid to keep the bund in good health and considers that it is doing a good job. Notes that the alert triggers have not eventuated and considers that if a golf course and dog park with accompanying roads can be sustained in the area then why not homes.		
		66.4		Considers that the plan change site is unsuitable for many beach people, with tricky road access, and more desirable section in Amberley.		
		66.5		Considers that the idea of beach folk paying for new homes at \$1 a day is fantasy, and questions the expected extra costs for relocating to Rosewood and establishing services to a dwelling, and whether beach sections will need to be cleared before relocation.		
		66.6		Concerned about the loss of productive rural land.		
67	William Leonard Gardner	67.1	Oppose	Concerned about what the conditions applying to the relocation will be, and only being offered one opportunity to agree to the relocation deal without knowing what these are. Also distrustful due to the lack of details provided about the bund.	Not stated.	Yes
		67.2		Concerned about the unaffordability of the costs to build on the new land.		
68	Robert Lovell & Josephine Lees	68.1	Oppose	Concerned about the impact of additional traffic, noise pollution, light pollution and more stormwater in an already wet area that has the potential to flood.	Not stated.	No
		68.2		Concerned about the impact on the submitter's rural views and the potential for the boundaries to move closer to the road opposite them.		
69	Gary Quinn	69.1	Oppose	Concerned that the stated relocation purpose of the rezoning is a red herring, due to the inability of Amberley Beach residents to afford to do anything with new land, and that the proposal is a way to get another new subdivision underway in Amberley under false pretences.	Reject Plan Change 7.	Yes
		69.2		Concerned that relocation was intended to be the last step, if necessary, and considers that the proposal puts the idea of abandonment of Amberley Beach in people's minds which is unfair and unreasonable.		
		69.3		Considers that it is reasonable for more effort to be put into securing the Amberley Beach settlement through more substantial works to the bund, rather than actively putting out the idea of relocation.		
70	Lynne M Cropper	70.1	Oppose	Considers that the beach community are not anywhere near a majority in favour of the relocation, with concerns about being worse off financially, and having no say in allocation of new sections.	Not stated.	Not stated
		70.2		Considers that the financial model does not stack up if there is no obligation for residents to relocate, making the financial burden riskier for HDC ratepayers. Also concerned that if the land is rezoned but then needed to be liquidated as an incomplete residential development, it would be a huge liability to ratepayers.		
		70.3		Concerned about the inexperience of HDC at undertaking development and potential additional costs of having to engage qualified consultants to address this.		
		70.4		Concerned about relaxed covenants for residential development making the remaining sections less appealing.		

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		70.5		Concerned about future disruption and possible restrictions on surrounding farmland arising from complaints from residents.		
71	John Raymond Hall	71.1	Oppose	Considers that the land was purchased too soon, that there was no consultation with residents, and that it is unsuitable as it is too far from the village. Considers it a good idea to move at some stage when triggers are indicated, but not to the proposed site.	Do not [proceed] with the proposed current site.	No
72	Adele Frye	72.1	Support	Not stated.	Not stated.	No
73	Sian Carson	73.1	Oppose	Does not support the long-term hazards facing Amberley Beach being used as justification for a 230-lot development, and notes that no triggers from the CAP have been met.	Decline Plan Change 7 – Rosewood Terrace in its entirety. That no development proceed until there is clear, independently verified evidence that: - Natural hazard risks and future climate change effects have been adequately considered; - Environmental, landscape and rural character effects are appropriately avoided, remedied or mitigated; - Any development is appropriately staged so that infrastructure and community services are available before additional residential development occurs; and - [There is] sufficient development capacity to service the development without unreasonable costs to ratepayers.	Yes
		73.2		Concerned about the implications of traffic, pressure on services, schools, wastewater, water supply, roads and community infrastructure.		
		73.3		Concerned about permanent loss of rural land.		
		73.4		Considers that the proposal does not provide an affordable and realistic option for existing residents and instead primary creates a new residential development opportunity.		
74	Grant Chapman	74.1	Oppose	Concerned about the purchase of land not being notified.	Keep this farm rural, not turned into residential.	Yes
		74.2		Considers that the infrastructure, including roads, drains and sewage will not handle the proposal and that there will be significant costs before development can progress. Questions who pays for these costs.		
		74.3		Concerned about who is paying for relocation as considers most residents do not want this and cost is out of their reach.		
		74.4		Concerned that HDC is trying to make another township outside of Amberley that is not wanted or needed.		
		74.5		Questions whether the campaign ground at the beach will be shut down and why it was upgraded if it may become obsolete.		
		74.6		Does not consider the ratepayers should pay for the proposal and the Council should be held responsible.		
75	Tracey Ann Chapman	75.1	Oppose	Concerned about the purchase of land not being notified.	Do not turn good rural land in into residential lots.	No
		75.2		Does not want ratepayers to have to contribute to the cost of the development of Rosewood and considers that no one wants it.	Ensure road access, water, wastewater, stormwater and other services are done correctly and do not affect Hursley Terrace Road.	
		75.3		Questions how relocation of homes from the Beach will achieve compliance.	Require that any relocation trigger be based on current independent technical evidence and publicly available.	
		75.4		Does not consider that good rural land should be turned into residential lots.		
		75.5		Questions who pays for road access, water, wastewater, stormwater and other services and considers it should be done so as not to affect Hursley Terrace Road.		

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		75.6		Questions how residents on Hursley Terrace Road will be compensated for having to live across from and being overlooked by a residential subdivision.		
76	Ray Wilshire	76.1	Support	Not stated.	Not stated.	Not stated.
77	Matthew Ross Harper	77.1	Oppose	Wishes to speak on the following matters concerning how the Rosewood plans will affect the submitters and ratepayers in the future: stormwater; sewer; property values; wetland areas; recreational; traffic; loss and insurance current and future; cost neutral; funding and CAP dependent Rosewood development links; RMA standing of the site.	That the consent authority makes a decision based on all aspects of the RMA that is based on the Majority of Beach Residents.	Yes
78	John Robert Manson	78.1	Oppose	Considers that the change from managed retreat, as used in the CAP, to proactive relocation, implies a bias towards urgency to relocate on HDC terms, and assume that a majority of ratepayers want to move when they don't, and are financially able to move when they couldn't. Also concerned that the ballot system would split up the community's social structure and that not all residents are willing to be in a ballot and a significant number would stay at the Beach, resulting in the proposal being a residential development only.	If PC7 is accepted, include the following points: - Honest descriptions of each of the 5 hazards using actual events if any and mitigations in place. - Keeping Rosewood land banked and maintain the bund until the Community decides the next action. - Formulate housing pathways for the elderly, based on the use of superannuation and Government subsidy to pay for alternative accommodation. To include a list of costs associated with a relocation including the value of land and buildings extinguished. - Give clear assurance of Insurance claims payouts (exemption from Section 74) by not clipping the five natural hazards to beach titles. - An arrangement to on-sell after accepting a balloted section, using the dollar a day deal, for the 30 years, for those able to. Allow the Beach and Rosewood sections to be sold on together without titles being stapled to make it easier to exit from the Beach. Sold to someone who wants to buy into a Rosewood section, who understands the Beach title extinguished. - An equivalent \$200,000 payout for the Natural Hazards Commission to incentivise movement to the new location. - Written assurance against forced location.	Yes
		78.2		Concerned about lack of transparency about the process and the compression of the CAP timelines by going straight to land purchase and subdivision without ratepayer involvement.		
		78.3		Considers that the bund will need significant maintenance to stay viable and questions why the costs of this are paid for by residents and not with government and council assistance.		
		78.4		Concerned that the Council is letting assets at the Beach run down, and that these are signs of HDC's intent to realise the transition.		
		78.5		Concerned about the social impacts on the community of not knowing what the Council is doing and finding out after the fact, especially those whose main investment is their Beach property; and the social costs not having been included in the PC7 proposal.		
		78.6		Concerned about costs of relocation and those who have no financial ability to relocate. Considers that there is not much guidance in PC7 on addressing the increasing costs and capital loss to Ratepayers, and makes suggestions to address these issues		
		78.7		Outlines contextual background to listed hazards [listed in submission].		
		78.8		Notes that those living at the Beach understand that it is a risk zone and that this was understood before the CAP existed, with the CAP providing a planned, alternative relocation pathway, over a 30-year period.		
79	Tiffany Kate Neylon	79.1	Oppose	Supports responsible long-term planning for the coastal hazards affecting Amberley Beach, but opposes PC7 in its current form because the Council has not demonstrated that this particular site, the proposed scale of development, and the proposed funding mechanism are the most appropriate means of achieving the objective.	Decline proposed Plan Change 7. Alternatively, if the Plan Change is approved in whole or in part, amend the provisions to: - Ensure residential development at Rosewood Terrace remains demonstrably connected to and necessary for the proactive relocation of Amberley Beach and cannot simply proceed as an unrestricted conventional residential subdivision;	Yes
		79.2		Concerned about permanent loss of HPL to residential use, and the claimed necessity for the loss being dependent on the proposed financial model. Considers that the Council should demonstrate not simply that the proposed amount of land is necessary under its chosen funding model, but that the funding model itself justifies the permanent loss of HPL and that reasonably practicable alternatives have been adequately considered.		

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		78.3		Concerned that the economic modelling anticipates the sale of market sections beginning soon after consenting and that these may therefore be sold and development many years or decades before relocation is required, which may practically result in Rosewood functioning primarily as a new residential subdivision with proactive relocation occurring much later. Does not consider that residential development justified on the basis of coastal adaptation should be detached from that stated purpose.	- Limit the extent of HPL rezoned and developed to the minimum demonstrably necessary. - Provide appropriate staging and limits on the number of market sections developed in advance of the relocation. - Provide greater protection to the wider community from financial exposure if development costs, market sales, timing or other assumptions differ from Council’s financial modelling. - Ensure the effects of the development on neighbouring rural properties, rural character, traffic, infrastructure and amenity are appropriately avoided, remedied or mitigated. - Require transparent and equitable arrangements for participation in, and allocation of sections under, the protective relocation scheme. - Make any other consequential amendments necessary to address the concerns raised in the submission.	
		78.4		Concerned that ratepayers bear the financial risk of the assumptions in the economic assessment provide incorrect, and seeks grater clarity on what ‘cost-neutral’ means in practice and who bears any shortfall.		
		78.5		Questions the extent to which the wider community should be responsible for preserving the private property equity of landowners exposed to a known natural hazard. Recognises that some owners purchased properties before hazards were known and considers that the Council should clearly distinguish between assisting an existing community with a historic problem and creating an ongoing expectation that future purchasers will have their equity protected.		
		78.6		Uncomfortable with details about the contractual and implementation methods for the relocation scheme being unresolved before the rezoning of HPL occurs.		
		78.7		Concerned about the change in rural character and amenity, traffic, infrastructure, visual effects and potential pressure for further residential development in this area resulting from the proposal.		
		78.8		Concerned with the sequence of decisions with the Council purchasing the property before the wider community has been asked through the present plan change process about whether this particular rural site should become a residential settlement, and the practical and financial incentive for the rezoning and development to proceed so that Council can recover its investment.		
80	Nigel John Gabrielson	80.1	Oppose	Considers that the purchase of the property has been rushed and the residents of Amberley Beach have not been heard. Considers that it is the wrong piece of land to relocate the Beach community to, and that a better property will become available over time and that with more and better consultation with Beach residents may come onboard.	Reject the plan change of Rosewood farm.	No
		80.2		Concerned in the loss of value of their property and inability to be able to afford to relocate.		
81	Barry Le Compte	81.1	Oppose	Notes that Amberley Beach batch owners have been paying rates and a levy to help protect properties from coastal change. Questions whether the new road to the golf course to replace the sea damaged one will be paid for by the golf club or by wider ratepayers.	Not stated.	Not stated.
82	Bev Watson	82.1	Not stated	Understands the need to plan for a proactive retreat from Amberley Beach, but considers that the Council has not yet answered all the questions residents have. Considers that communication has been inadequate and confusing, resulting in a lack of trust and in anxiety, resulting in pressure to make a quick decision about the current proposal.	That the Council put this whole undertaking on hold until the rezoning of the land has been achieved, and the beach community feels confident that their questions have been answered.	Yes
		82.2		Outlines questions and concerns relating to costs and practicality of rebuilding and demolishing, or relocating homes.	That the Council and the beach community continue open, honest, respectful and transparent dialogue until such time as a plan has been identified that is acceptable to both parties.	
		82.3		Questions the Council proceeding with the proposal before the Amberley Beach community has indicated support and before the approval of the rezoning; and whether the potential consequences of merging councils and potential change in national government have been considered.		

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		82.4		If the proposal goes ahead, is concerned about the proposed ballot system that could result in the current community becoming fractured. Questions if the street layout at Rosewood could replicate that of the current beach with sections allocated based on an equivalent position.		
83	Carl Krijt	83.1	Oppose	Considers that the proposal is based on a CAP which is now considered implausible, and that until a CAP which is plausible is in place PC7 should not proceed.	Undertake a full survey of Amberley Beach landowners before determining if Rosewood should proceed.	Not stated
		83.2		Considers the 25m provisional loan from LGNZ is premature and burdens the Hurunui ratepayers.		
		83.3		Considers that the fluvial threat to Amberley Beach has been greatly diminished, and that this threat was of more concern than sea inundation.		
		83.4		Does not consider that HDC should be in the business of land and house speculation.		
		83.5		Considers the construction of a satellite village outside of the Amberley precinct, and proceeding with the plan change and associated costs to please a small fraction of the community, to be irresponsible and a burden on ratepayers.		
				Considers that HDC should not put itself in a position that is outside of its own rules regarding productive land and future housing development without amenities.		
84	David Melville & Gail Carr	84.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full, retaining the Rural Zone over the site. Require Council to reassess relocation options using updated, evidence-based climate hazard modelling. Protect highly productive rural land from unnecessary rezoning. Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth. Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development. Listen to what the residents want, not what the Council or it's employees want.	Yes
		84.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.		
		84.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.		
		84.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.		
		84.5		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.		
85	Dylan Ross & Kate McCarthy	85.1	Oppose	Opposed to the Council engaging in this plan change and relocation and the associated costs, when ratepayers are subject to high rates and very average services. Considers that the Council should focus on its prescribed job of providing proper and cost-effective services to the district.	Not stated.	Yes
		85.2		Concerned that this is good farmland, never intended for residential use, and questions who wants another urban centre on SH1 between Christchurch and Amberley.		
		85.3		Concerned about detrimental affect on increased traffic on their doorstep, and their property being transformed from 'rural' to 'semi-urban'.		
		85.4		Considers that Amberley Beach has carried on for years and will continue to carry on for years at the Beach, and considers that the Council is pursuing an agenda and relying on selective 'scientific' information.		

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		85.5		Concerned about the size of the subdivision and inclusion of lots for the general public on land that is not zoned for it, and considers they should be compensated for the loss of lifestyle.		
		85.6		Considers that the Council is not big enough or sophisticated enough to be dealing with issues like these, and that they should not be a developer. Considers that There are already plenty of subdivisions and available sections around Amberley township where they belong.		
86	Joy Clark & David George Clark	86.1	Support	Does not wish to leave the Beach but notes that Rosewood might provide them with a back-up plan.	Not stated.	No
87	Jacque Georgeson & David Cosby	87.1	Oppose	Queries where documentation is regarding Amberley Beach Residents agreeing to the plan, and considers that a 1-question yes/no survey with less than a 30% response rate is not a valid means to develop an action plan.	Revisit the original CAP plan.	Yes
		87.2		Questions what further reviews have been undertaken to reassess the hazards, and whether the assumptions identified in the CAP should be used as current data or the hazard reassessments reevaluated with more current and relevant data.	Require Council to work within the CAP plan. If this document has been judged to be unfit for purpose, return to the “adaptive pathway planning” as identified in the CAP document, section 1.3.	
		87.3		Notes that no triggers in the CAP have been achieved at this point and questions why the plan is focused on implementing proactive relocation rather than comparing other pathways.	Include clear, objective, and evidence-based triggers for any decision to initiate conversations on the next steps of the CAP plan.	
		87.4		Considers that the plan’s conclusion that there are not any practical alternative sites appears to be technical rather than a subjective analysis and questions the documentation the council has providing a comparative analysis of multiple sites, and whether the s32 Report adequately assesses all of the pathways or is the main purpose a focus to justify proactive relation.	Require Council to consult directly with Amberley Beach Residents before any relocation pathway is initiated.	
		87.5		Notes that the report emphasises cost neutrality and questions aspects of the basis for this.	Require transparent reporting of all costs and expectations on infrastructure, rating, lot pricing, affordability, development contributions.	
		87.8		Questions whether engineering evidence been obtained about the status and life expectancy of the bund since completion of refurbishment in 2025.	Require Council to publish a framework for a relocation prior to any pathway being activated.	
		87.9		Notes that the CAP uses the scenario and data modelling for RCP8.5 which is extreme and has been proven to be inaccurate.		
		87.8		Concerned that the Council is not being honest and transparent about all of the “hidden” costs of the managed relocation such as connections to services and section clearance costs.		
		87.9		Concerned that that the Council is being neither honest nor transparent, is not acting in good faith, and is not providing sufficient documentation for due diligence of the land purchase, the loan, the project development of the subdivision or the full costs of this endeavor.		
88	Jennifer Madeleine Campbell (Goulding)	88.1	Oppose	Considers that the PC7 application as part of Council’s managed retreat programme will lead to a severe financial loss to the ratepayers at Amberley Beach, for both those who subscribe to the scheme and those who don’t.	Decline PC7.	Yes
		88.2		Considers the bund to be the longterm protection against any contingent ocean event.		
		88.3		Consider that the managed retreat scheme should be stopped, and revived in 50 years if it is needed.		
		88.4		Considers the scheme to be premature, based on extreme climate modelling used in the CAP, and aimed at a remote risk, when there is no need for managed relocation with engineering solutions progressing in effectiveness.		
		88.5		Questions whether HDC has properly consulted the Community in respect of their managed relocation scheme and PC7		

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		88.6		Queries the financial projections of HDC's subdivision.		
		88.7		Considers that if the subdivision goes ahead and lots are not offered to Amberley Beach owners, the projected surplus could be allocated to the Amberley Beach settlement for protection systems, drainage and enhancing the amenities at the Beach.		
89	Margaret Christine Forbes	89.1	Oppose	Does not consider that Council should be creating more residential land that is not adjacent to other residential land or within walking distance of Amberley, when residential sections are available in or close to Amberley.	Decline permission to change the status of sections at 185 Ashworths Road from rural to residential. Remove the whole project from the Council's agenda until such time there is clear evidence that said plan will be both necessary and beneficial.	Yes
		89.2		Concerned about the proximity of State Highway 1 making it noisy and making exiting dangerous.		
		89.3		Considers that the present plan is now unaffordable for some and that most residents will prefer to stay where they are.		
		89.4		Considers that the size and location of the subdivision is unfit for purpose.		
90	Nikki & Johnathan Nevin	90.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full - Retain the Rural Zone at the site.	Yes
		90.2		Concerned that the proposal will create reverse-sensitivity effects and place pressure on existing Rural activities.	Protect highly productive rural land – Reduce from unnecessary rezoning.	
		90.3		Concerned that 230 residential lots will significantly change the traffic, drainage and stormwater characteristics of the area, and that the adverse effects from the increase of traffic, construction activity, and changes to runoff and drainage will be transferred onto neighbouring rural properties.	Protect neighbouring rural properties – Ensuring rural landowners can continue with normal primary production activities without unreasonable reverse-sensitivity effects from residential development.	
		90.4		Concerned about the cumulative loss of rural character and productive land resulting from the proposal representing a significant change from an established rural environment to an urban residential environment.	Protect Newcombes Road and Beach Access – That the council undertake a thorough assessment of the effects of the development on Newcombes Road, including increased traffic, road safety, maintenance and the beach access.	
		90.5		Concerned about the increased pressure on Newcombes Road and Beach access resulting from increased traffic on Newcombes Road.	Require Appropriate stormwater and drainage controls - Appropriately managed and no other neighbouring or adjoining rural properties are affected.	
91	Natural Hazards Commission Toka Tū Ake (NHC)	91.1	Support	Supports rezoning land to enable the relocation of the Amberley Beach community to areas that are not exposed to climate related hazards including fluvial and pluvial flooding, coastal erosion, coastal flooding, and rising groundwater.	Retain the proposed planning map changes.	No
		91.2		Supports the use of No Build Areas to manage landslide risk, where recommended in the geotechnical assessment.	Retain Rule 4.6.25(a).	
		91.3		Supports directing residential development away from areas of slope instability to avoid or reduce future natural hazard impacts.	Retain Policy 4.32 (v).	
92	New Zealand Transport Agency Waka Kotahi	92.1	Neutral	Comfortable with the proposed design of the new SH1 intersection and the overall conclusions reached in the ITA. Considers it appropriate for the subdivision of the ODP area to have an overall Restricted Discretionary Activity status, as a controlled status would limit NZTA's ability to request and/or recommend changes to the intersection design, and prevent their identification as an affected party to any subdivision application. Considers that a Restricted Discretionary Activity status also ensures that appropriate consideration is given to the Hursley Terrace Road and Crosses Road intersections with SH1.	Amend the activity status to be a Restricted Discretionary Activity subdivision (at the very least), if this is not already the case for the subdivision of the ODP area.	Yes

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		92.2		Considers specific reference to the SH1/ODP roading connection should be made under Rule 5.6.11.2 (as a matter of control) and under Rule 5.4.4 (as a matter of discretion), given the importance of the SH1 intersection design to serve the development. Notes that as the Road Controlling Authority for SH1, the submitter wants to ensure that what is approved at the subdivision consent stage is consistent with the outcomes recommended in the ITA for the ODP and that the design aligns with its requirements, which will enable the approval of the Corridor Access Request that is required to undertake the works and is separate to the RMA consenting process.	Include additional matters of control under Rule 5.6.11.2 and matters of discretion under Rule 5.4.4, so that specific reference is made to the SH1/ODP road intersection design and timing of delivery. The matters for consideration should be worded in such a way to ensure the design of the intersection is delivered as intended, prior to s224 being issued for subdivision and prior to the occupation of any residential unit/dwelling, and as outlined in the ITA submitted with the PC7 application.	
93	Paula Le Compte	93.1	Oppose	Concerned that a survey undertaken by HDC has been used as the basis to proceed with a land purchase, not the steps laid out in the CAP and MR&LB Proposal.	Do not proceed at this time with PC7. Instead, hold the land for “land-banking purposes” pending an independent review of the science on which the CAP is based, using the modified more realistic potential modelling, instead that used by Jacobs. Then re-engage the community to discuss the ongoing suitability of the CAP and triggers, by utilising the known addresses (email/physical) of all ratepayers. Bring the good intent from the Coastal Conversations 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.	Yes
		93.2		Concerned that insufficient consultation with property owners has been undertaken, including details about the process being decided by the Council rather than the affected community.		
		93.3		Notes that the CAP & Jacob’s report has not been reviewed since stormwater flood prevention actions have been undertaken, and uses highly speculative Sea Level Rise projections, and has not been peer reviewed. Considers that this should have occurred before any move to PC7.		
		93.4		Concerned that ratepayers were not consulted on debt funding facility to purchase the land and that the purchase cost of Rosewood Farm may not be recoverable due to further additional costs spent on planning.		
		93.5		Concerned that HDC becoming a property owner is not the purpose of local government, noting the current focus on a return to core services, rate freezes and amalgamations for cost efficiencies. Considers that Councillors do not have a mandate to proceed with this scale of a commercial business venture.		
		93.6		Considers that PC7 is undermining the use of the DAPP in the CAP making its relevance and worth questionable.		
		93.7		Concerned about PC7 being applied for when the level of voluntary uptake is unknown.		
		93.8		Notes that PC7 enables more sections than the MR&LB Proposal outlined, which further dilutes the beach community, which further decreases the lower the level of uptake, and which depending on the ballot process may further fragment the beach community such that no community feel would be retained.		
		93.9		Considers that PC7 contradicts the District Plan and the NPS-HPL by converting productive land. Concerned that division of from the farm of the 34 hectares proposed would also create a challenge to selling the rest of the un-needed farmland – as the proposed access road would cross through the farm’s centre.		
		93.10		Consider the plan purchase premature when it has not been triggered under the CAP or via the DAPP and does not follow the process in the MR&LB Proposal. Considers that there is no requirement to change the zoning until the agreed triggers have occurred, as the land may never even be required.		
		93.11		Notes lack of consultation and consideration of impacts on surrounding rural properties, including the impacts of years of site development.		
		93.12		Concerned about financial exposure of the residents not having been considered, such as having 2 rateable properties, the expense of building or relocating dwellings and the clean up of existing sections, and the financial pressure resulting from reduced security in owning a dwelling, due to perceived value and insurability now questioned. Also concerned that there is		

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				a risk for individuals of financial over commitment, noting that an agreement made now could be impossible to meet and debt service in even 10 years time.		
		93.13		Notes the supply of land in Amberley and considers that the sales of surplus sections in a further satellite subdivision is not guaranteed.		
		93.14		Concerned that relocation of beach homes is speculative, would be subject to regulatory control, and would not be appealing to others purchasing land.		
		93.15		Concerned that the assessments do not address the narrow rural road nature of Hursley Terrace Road and that considerable expense would be required to improve the road; that Newcombes Road is unsuitable for increased traffic; and that there are increased risks from the proposed access road onto SH1.		
		93.16		Considers that the sea view is minimal as it is distant, the view is restricted to those on the terrace edge; and that over time this outlook would likely be reduced further with tree/forestry planting on the terrace edge and on land in the lower area. Considers this is not the same as, and creates uncertainty for, the current community, which is easily able to the sea and waterways, and that people have purchased in order to be close to the sea/waterways. Considers that the loss of amenity of being a coastal community is not addressed by the assessment material, and that those lifestyle features and recreational outlets important to well-being at Amberley Beach do not exist at the proposed site.		
		93.17		Concerned that property owners are 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.		
		93.18		Notes the existing protection provided by the bund, and the potential identified under the CAP for more permanent material use being possible.		
		93.19		Considers that the infrastructure costings of the subdivision are not fully known, and is concerned about the capacity of the water supply and wastewater networks, and whether the KHWS [water entity arrangement with Kaikoura] has scoped or budgeted for this subdivision's requirements.		
		93.20		Concerned that the option to review where the community may wish to relocate to has been potentially removed without consultation by the purchase of Rosewood Farm, not allowing for the land banking of a better located and preferred block of land becoming available for any potential future retreat. Considers that this is the opposite of the intended flexibility and options under the DAPP, and that it pre-determines a retreat, whether it is needed or not.		
		93.21		Considers that the uncertainty of whether the land will be needed at all should preclude the zone change from being undertaken at this time. Considers that if instead, it is just "land banked", it can then remain as rural and be sold if not required, or a more appropriate agreed location is sourced.		
		93.22		Concerned that there is no backup plan for if surplus sections take time to sell, or other scenarios eventuate, and considers expected sales are highly speculative.		
		93.23		Concerned about the PC7 process impacting the saleability of properties and creating uncertainty and worry.		
		93.24		Concerned that without an imminent need for the relocation of Amberley Beach residents, low uptake could result in more of the development becoming part of an outlying residential		

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				subdivision, that need to be sold, rather than a relocation pathway as contemplated in the CAP and in the funding from the LGFA.		
		93.25		Concerned that PC7 lacks safeguards for vulnerable residents, where a proactive relocation is beyond their financial means, and that the process is impacting their well-being.		
94	Sue & George Kemp	94.1	Oppose	Does not think this rural land should be rezoned for housing, as too much farmland in Amberley is already being lost; and the site is larger than necessary to rehouse Amberley Beach residents.	Decline the proposal to rezone 185 Ashworths Road.	Not stated
		94.2		Concerned about lack of consultation regarding land purchase.		
		94.3		Concerned about affordability for Beach Residents of building new homes, and that the implementation pathway in CAP has not been followed.		
95	Scott Orpwood	95.1	Oppose	Considers that the managed relocation of Amberley Beach is premature, that is has not followed proper process, no trigger point have been reached and no up-to-date science and data has been obtained to justify it.	Decline PC7.	Yes
		95.2		Concerned about lack of consultation with Amberley Beach property owners.		
		95.3		Considers that Rosewood is an inappropriate location for urban development, and that it will increase congestion, traffic hazards and spoil the aesthetic farming landscape.		
		95.4		Concerned that the scale of development exceeds any relocation need and is likely to result in a standard residential subdivision which few if any Amberley Beach owners will take up.		
96	Marc Edward & Tracey Joan Coultuard	96.1	Oppose	Concerned that PC7 has been proposed to facilitate protective relocation of Amberley Beach when no triggers in the CAP have been reached yet. Considers that 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.	Decline Plan Change 7, or at a minimum pause it until: - the CAP 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 PC7, the land-banking proposal and the agreed trigger-based CAP process has been clearly explained.	Yes
		96.2		Concerned that a requested review of the CAP has not occurred.		
		96.3		Considers that a new residential subdivision cannot simply recreate that makes Amberley Beach the community that it is.		
97	Sean Doak	97.1	Oppose	Concerned that PC7 is based on an assumption that proactive relocation is the appropriate solution, when does not believe that has been established, or that it should be accepted that Amberley Beach must eventually be relocated simply because relocation has been identified as one possible pathway in the CAP, as the CAP does not establish that relocation is inevitable.	Decline Plan Change 7. At a minimum, 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	Yes
		97.2		Concerned that the PC7 material does not provide sufficient evidence that the triggers in the CAP have been reached to justify progressing to permanent residential zoning, and questions why the Council is now treating the Rosewood rezoning as the necessary next step.		
		97.3		Considers that before making a rezoning decision, current evidence should be reviewed.		
		97.4		Considers that 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.		

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		97.5		Concerned that the financial case supporting PC7 is not certain, and that the financial outcome depends on assumptions about development costs, market values, demand and timing. Is not satisfied that the financial risks have been adequately addressed and questions who carries the risk if the development does not produce the anticipated return.	- all available alternatives to a large-scale residential rezoning.	
		97.6		Question whether permanently rezoning of this HPL land can be justified when the need for the proposed development remains uncertain; and that 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.		
		97.7		Does not consider that the purchase of Rosewood should predetermine what happens to the land, and that if the current evidence does not justify residential zoning, the Council should be prepared to reconsider the proposal rather than proceed simply because the property has already been purchased.		
98	Adele Brown	98.1	Oppose	Concerned 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.	Decline Plan Change 7. If Council believes the CAP remains the appropriate framework, then 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.	Yes
		98.2		Accepts that coastal hazards need to be taken seriously, but not that the existence of these automatically means that Amberley Beach should ultimately be relocated, or that Council should therefore rezone approximately 34 hectares of rural land now.		
		98.3		Does not believe the CAP established that proactive relocation was the inevitable or preferred outcome; and is concerned that the 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.		
		98.4		Considers that before making a permanent change to the District Plan, current evidence should be independently reassessed, and that until that information [listed in submission] is available, there is not sufficient evidence to justify proceeding with PC7.		
		98.5		Considers that an independent review of the hazard modelling, climate assumptions and projections used to support the CAP and PC7 should be undertaken before a decision is made that could permanently change the future of Amberley Beach and remove a large area of productive rural land from its current use.		
		98.6		Concerned about the financial justification and that there remains a financial risk associated with development costs, infrastructure costs, property values, market demand and the timing of any development. Concerned about 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.		
		98.7		Concerned about the permanent loss of HPL, and that the 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. Does not believe that is sufficient justification when the necessity and timing of the relocation itself remain uncertain.		
		98.8		Does not consider that the purchase of Rosewood land in itself should mean that it should be rezoned of developed.		
99	Groundswell NZ	99.1	Oppose	Concerned about permanent loss of HPL.		Yes

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		99.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.	Decline Plan Change 7 in full, retaining the Rural Zone over the site.	
		99.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.	Require Council to reassess whether relocation is necessary or justified using updated, evidence-based climate hazard modelling.	
		99.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.	Protect highly productive rural land from unnecessary rezoning.	
		99.5		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.	Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth.	
		99.6		Considers that aspirations to keep the integrity of the Amberley Beach community housed in one area of new development is fanciful; and that it would make more sense to add to the existing urban footprint area of Amberley or create opportunities to cater for Amberley Beach residents in new subdivisions.	Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	
100	Ann Rebecca Malthus	100.1	Support with amendments	Supports PC7 subject to the amendments and clarifications outlined in the submission (regarding specific, detailed information as to the when's, how's and why's of the relocation framework). Considers that the proposal is a positive and necessary planning response to the long-term risks affecting the Amberley Beach settlement, and that the Council should plan to support this hazard-affected community.	Rezone the relevant part of 185 Ashworths Road, Amberley, to Residential 1.	No
				Notes that the chosen location is in a nearby area, giving similar access to the current environment, and allows for the relocation of the community in a manner that is cost neutral to other residents in the district.	If the rezoning is approved, Council should maintain regular communication and negotiation with the Amberley Beach Residents Association to finalise detail about the potential relocation of residents (as outlined in the submission), in a manner agreeable to both parties, with these details are recorded and shared publicly.	
101	Christopher Herbert	101.1	Oppose	Concerned about permanent loss of HPL.	Decline Plan Change 7 in full, retaining the Rural Zone over the site.	No
		101.2		Concerned that rezoning rural land will introduce residents who may be unfamiliar with rural activities and lead to reverse sensitivity pressures on established farming operations.	Require Council to reassess whether relocation is necessary or justified using updated, evidence-based climate hazard modelling.	
		101.3		Concerned that the plan change is being justified based on coastal hazard risk, but that this is based on extreme climate scenarios, and the relocation rationale is not robust enough to outweigh the significant adverse effects of converting productive rural land to residential.	Protect highly productive rural land from unnecessary rezoning.	
		101.4		Considers that PC7 contradicts the District Plan Objectives and rural zoning purpose, and that the land is not naturally appropriate for residential zoning under the district plan framework.	Avoid reverse-sensitivity conflicts by keeping residential development within existing urban zones or areas already identified for growth.	
		101.5		Concerned about the impacts of the Council selling remaining sections on the open market to cover the costs of land purchase and the plan change process.	Ensure future planning decisions align with District Plan objectives for rural land protection and sustainable development.	
102	Fire and Emergency New Zealand	102.1	Neutral	Considers that adequate access for new developments and subdivisions is required to ensure that it can respond effectively in an emergency, and states that future access within the development area is generally considered to be adequate.	Amend PC7 to expressly require the formation and construction of both access connections shown on the ODP 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.	Yes
		102.2		Supports the proposed provision of access to the development from both Ashworths Road and Hursley Terrace Road, to improve network resilience and help maintain emergency access should one route become unavailable. However, is concerned that while the 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;		

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				and that there does not appear to be an explicit rule or standard requiring both accesses to be delivered.		
103	Anthony Charles Trewinnard	103.1	Oppose	Supports the CAP and the DAP approach it embodies; supports land banking in principle; and that the purchase of Rosewood secured an option that may not be available later. However, opposes PC7 due to what it actually enables, and that it does not hold land in readiness for a trigger-based relocation, but instead enables the immediate commercial development of HPL commencing before any adaptation trigger has been met, and out-of-sequence with the CAP and the MR&LB Proposal.	That Plan Change 7 be declined, and that the land be retained in its current Rural zoning until a trigger under the CAP 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. In the alternative, if the Commissioner is minded to approve a rezoning in some form, make 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. Note that submission supports the CAP 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.	Yes
		103.2		Notes that the CAP and the DAP both anticipate a plan change occurring after agreed triggers are reached and a decision made to retreat.		
		103.3		Concerned that premature development forecloses the community's decision on other options and that PC7 instead entrenches one pathway, financially and psychologically, before the community's decision between pathways has been made.		
		103.4		Considers that there is nothing in the PC7 material identifies a present need to develop, and that in the meanwhile leasing the farm for productive use, generates rent to the Council, demonstrating that the current Rural zoning is fully compatible with the land-banking function. Considers that the cost of deferral is modest and acknowledged; and the benefits of it are substantial. Also notes the timeframes for the triggers to be reached may also prove longer than the planning assumptions suggest, due to the CAP's hazard assessment being based on RCP 8.5 and RCP 8.5+ scenarios only.		
		103.5		Does not consider that the NPS-HPL tests are met in terms of the zoning being required to provide sufficient development capacity to meet expected demand; lack of consideration of rezoning only after trigger conditions are met as a reasonably practicable and feasible option; the cost-benefit balance weighing certain, immediate costs against contingent, deferred benefits; and that the area rezoned is larger than necessary.		
104	Mrs Nicola Reed	104.1	Oppose	Considers that the CAP was not agreed by a majority of residents; that it was put in place as a protection method for when hazards occurred and that the hazards/triggers have not occurred; and questions whether the CAP is appropriate and accurate. Notes that there are other methods for the bund and that managed retreat was the last, not the first, option, and is concerned that the report is entirely focused on proactive relocation rather than other methods.	Independently review the CAP before using it to justify the permanent rezoning of productive rural land.	Yes
		104.2		Concerned that PC7 has caused a loss of stress and anxiety and resulted in a decrease in property value. Concerned about the financial pressure of managed retreat and unaffordability of rebuilding and demolition costs, and lack of financial support offered, and that it is not cost neutral for Amberley Beach residents.		
		104.3		Considers that the managed retreat process has not been agreed by Amberley Beach residents, nor the location, and that the justification for rezoning HPL is that no other sites exist, which the submitter does not believe is the case.		
		104.4		Concerned that the ballot process will not keep the community connected.		

Submission #	Submitter Name	Point #	Position	Submission Summary	Decision Sought	Heard?
		104.5		Concerned about the process being heavily reliant on the CAP, and that it needs to be independently reviewed before being used to justify permanent rezoning of productive rural land.		
		104.6		Concerned that the s32 report doesn't present a comparative assessment of other sites.		
105	Jicinta McBain	105.1	Oppose	Concerned that relocation will leave them out of pocket.	Before a decision is made, undertake more discussion around: - Is the move [voluntary] or [do] you have to move. - It needs to be financially viable. - If there is an option of doing more protection work around Amberley Beach.	Yes
106	Dianne Le Compte	106.1	Oppose	Notes improvements made to their property over time, the increase in permanent residents at the settlement, and the close-knit nature of the community and its attractiveness due to the sea and affordability. Notes that residents understood that under the CAP, nothing would happen until one of the chosen triggers happens.	Not stated.	Yes
		106.2		Considers that the first line of defence for Beach residents is the bund, and questions why this is funded by residents if the new golf course access road is to be funded by HDC.		
107	Rosalie Rogers	107.1	Support in part	Believes it is sensible to plan ahead rather than wait until a major event forces people to make decisions under pressure, and therefore sees merit in the concept of purchasing land on the hill as a potential future relocation option. However, is concerned that 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. Concerned that residents are being asked to make a significant financial and potentially life-changing commitment before enough of the detail is known.	Provide residents with much more detailed information, independent assessment and further consultation before being required to make an irrevocable financial commitment.	Not stated
		107.2		Questions whether the new arrangement will genuinely protect the value and future usefulness of properties for the next generation, and how ownership and inheritance matters will be addressed, seeking an independent review (of matters listed in submission) by legal advisers.		
		107.3		Concerned about the scientific basis for the relocation decision, and that the modelling previously used to inform the Council's planning has subsequently been questioned as being too extreme. Requests a clear explanation of the information the Council is relying on (outlined in submission).		
		107.4		Seeks clarification on what the \$11,000 contribution provides, and what the total cost of participation beyond this is likely to be; whether residents will have to pay rates for both properties at the same time; and what happens to residents who cannot or do not participate.		
		107.5		Concerned about the fairness of the ballot system; and requests consideration of the social value of keeping the community together and avoiding fragmentation of the existing community.		
		107.6		Supports creation of a communal area at the front of the hill development where residents can retain access to the sea view, and encourages protecting such an area permanently.		
		107.7		Notes that circumstances may change and considers that the proposal should therefore contain clear mechanisms for review.		

Submission #	Submitter Name	Point #	Position	Submission Summary	Decision Sought	Heard?
		107.8		Seeks an explicit commitment from Council about maintaining services to the beach, to avoid residents being forced to participate in the relocation scheme because services to the existing community are gradually reduced.		
		107.9		Considers that residents would benefit from an independent assessment covering matters listed in submission (relating to hazard modelling, costs and other financial implications, legal arrangements etc.)		
108	Glenys Metcalfe	108.1	Oppose	Considers that the motivation for PC7, being the threat to Amberley Beach from extreme climate change caused by carbon dioxide, has been proven to be nonsense, and that HDC has not obtained authoritative evidence regarding hazard risk, as it has relied solely on a report by Jacobs, who has been widely discredited in the area of coastal planning and risk analysis. Considers that coastal disasters in New Zealand over recent years, initially been attributed to climate change have all been shown to be the result of neglect and incompetence, mainly by local councils. Considers that there has been poor maintenance of the bund between the beach and settlement	Sell Rosewood Farm as is, or divide it into four hectare lots for individual sale.	Yes
		108.2		Considers that Rosewood Farm is productive agricultural land with good soils and should remain so, not become another urban settlement on rural land between Amberley and Leithfield.		
		108.3		Concerned that the proposed development would in effect create a substantial new settlement that would not be part of Amberley, Amberley Beach or Leithfield, with no facilities of its own, requiring residents to drive everywhere and result in additional car journeys. Considers that future growth should be encouraged in and around Amberley, where there are existing facilities and where any extra commercial facilities would be appropriate, and with encouragement for walking and cycling.		
		108.4		Concerned that the new settlement would cause SH1 between Leithfield and Amberley to become more dangerous, with many more serious accidents.		
		108.5		Considers borrowing for the purchase of Rosewood Farm to be huge and irresponsible in the current economic circumstances, and is concerned about ratepayers covering future losses.		
		108.6		Considers that the Council should leave subdivision to private developers who are better suited to take such risks and should focus on core job of providing normal infrastructure to ratepayers.		
		108.7		Concerned about the voluntary approach becoming compulsory, and the costs associated with home demolition and removal resulting from pressure on property owners that relies on coastal reports written by discredited authors.		